



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 5  
77 WEST JACKSON BOULEVARD  
CHICAGO, IL 60604-3590

REPLY TO THE ATTENTION OF:

HRE-8J

November 24, 1992

Mr. Mark Fehlmann  
Environmental Manager  
American Tape Company  
317 Kendall Avenue  
Marysville, MI 48040

Re: Visual Site Inspection  
American Tape Company  
Marysville, Michigan  
MID 061 862 926

Dear Mr. Fehlmann:

As indicated in the letter of introduction sent to you on March 11, 1992, the U.S. Environmental Protection Agency is enclosing a copy of the final Preliminary Assessment/Visual Site Inspection (PA/VSI) report for the referenced facility. The executive summary and conclusions and recommendations sections have been withheld as Enforcement Confidential.

If you have any questions, please call Francene Harris at (312) 886-2884.

Sincerely yours,

A handwritten signature in dark ink, appearing to read "KMP", is located below the "Sincerely yours," text.

Kevin M. Pierard, Chief  
Minnesota/Ohio Technical Enforcement Section  
RCRA Enforcement Branch

PRC Environmental Management, Inc.  
233 North Michigan Avenue  
Suite 1621  
Chicago, IL 60601  
312-856-8700  
Fax 312-938-0118



**PRELIMINARY ASSESSMENT/  
VISUAL SITE INSPECTION**

**AMERICAN TAPE COMPANY  
MARYSVILLE, MICHIGAN  
MID 061 862 926**

**FINAL REPORT**

**Prepared for**

**U.S. ENVIRONMENTAL PROTECTION AGENCY  
Office of Waste Programs Enforcement  
Washington, DC 20460**

Work Assignment No.	:	R05032
EPA Region	:	5
Site No.	:	MID 061 862 926
Date Prepared	:	November 11, 1992
Contract No.	:	68-W9-0006
PRC No.	:	309-R05032MI22
Prepared by	:	PRC Environmental Management, Inc. (Jeff Swano)
Contractor Project Manager	:	Shin Ahn
Telephone No.	:	(312) 856-8700
EPA Work Assignment Manager	:	Kevin Pierard
Telephone No.	:	(312) 886-4448

## TABLE OF CONTENTS

<u>Section</u>	<u>Page</u>
EXECUTIVE SUMMARY .....	ES-1
1.0 INTRODUCTION .....	1
2.0 FACILITY DESCRIPTION .....	3
2.1 FACILITY LOCATION .....	3
2.2 FACILITY OPERATIONS .....	3
2.3 WASTE GENERATION AND MANAGEMENT .....	5
2.4 HISTORY OF DOCUMENTED RELEASES .....	11
2.5 REGULATORY HISTORY .....	14
2.6 ENVIRONMENTAL SETTING .....	16
2.6.1 Climate .....	16
2.6.2 Flood Plain and Surface Water .....	17
2.6.3 Geology and Soils .....	17
2.6.4 Ground Water .....	17
2.7 RECEPTORS .....	18
3.0 SOLID WASTE MANAGEMENT UNITS .....	20
4.0 AREAS OF CONCERN .....	28
5.0 CONCLUSIONS AND RECOMMENDATIONS .....	29
REFERENCES .....	35

### Attachment

- A VISUAL SITE INSPECTION SUMMARY AND PHOTOGRAPHS
- B VISUAL SITE INSPECTION FIELD NOTES

## LIST OF TABLES

<u>Table</u>		<u>Page</u>
1	SOLID WASTE MANAGEMENT UNITS .....	6
2	SOLID WASTES .....	8
3	SWMU AND AOC SUMMARY .....	33

## LIST OF FIGURES

<u>Figure</u>		<u>Page</u>
1	FACILITY LOCATION .....	4
2	FACILITY LAYOUT .....	7

## EXECUTIVE SUMMARY

ENFORCEMENT  
CONFIDENTIAL

PRC Environmental Management, Inc. (PRC), performed a preliminary assessment and visual site inspection (PA/VSI) to identify and assess the existence and likelihood of releases from solid waste management units (SWMU) and other areas of concern (AOC) at the American Tape Company (ATC) facility in Marysville, St. Clair County, Michigan. This summary highlights the results of the PA/VSI and the potential for releases of hazardous wastes or hazardous constituents from SWMUs and AOCs identified.

The ATC facility manufactures pressure-sensitive, solvent-based adhesive tapes. The facility generates and manages the following waste streams: solvent-contaminated waste oil (D001), waste adhesive (D001), paint waste (D001), waste isopropanol (D001), silicone, cleaning rags and filter socks (D001 and F005), resin oven drippings, waste water-soluble oil, waste oil, contaminated and off-specification solvents (D001), oven dust, and spent activated carbon. ATC has operated at its current location since 1983. The facility occupies about 11.2 acres in an industrial park and employs about 340 people. The facility is currently regulated as a treatment, storage or disposal facility pending closure of the Former Hazardous Waste Storage Area (SWMU 8).

The Dow Magnesium Corporation built the ATC facility during World War II and operated it as a munitions plant. After the war, the property was sold off in separate parcels to numerous parties as part of the Surplus Land Act of 1946. In 1962, American Pres-Stik Tape Company (APT) and K&K Investments (K&K) purchased the bulk of the facility and began tape manufacturing operations. In 1965, APT and K&K sold their operations to Armour Company (Armour) who continued to manufacture tape. In 1966, Armour purchased the warehouse parcel and expanded the facility. In January 1971, Armour sold the facility to the Armak Company who, in 1983, sold it to ATC. In July of 1990, ATC's stock was sold to the Seoul Trading Company of North America (STCNA), a Korean-based concern. Currently, STCNA owns the property and ATC operates the facility.

The facility filed a Part A permit application on April 29, 1983 for its Former Hazardous Waste Storage Area (SWMU 8). This unit is currently undergoing RCRA closure.

The PA/VSI identified the following nine SWMUs and two AOCs at the facility:

RELEASED  
DATE  
RIN #  
INITIALS

6/18/01  
WTV

#### Solid Waste Management Units

1. Hazardous Waste Storage Area
2. Solvents Satellite Accumulation Area
3. Gaylord Boxes
4. Nonhazardous Liquid Wastes Storage Areas
5. Oil/Water Satellite Accumulation Area
6. Waste Adhesive Satellite Accumulation Area
7. Paint Waste Satellite Accumulation Areas
8. Former Hazardous Waste Storage Area
9. Isopropanol Satellite Accumulation Area

ENFORCEMENT  
CONFIDENTIAL

RELEASED

DATE

RIN #

INITIALS

6/18/01

WTV

#### Areas of Concern

1. USTs No. 202 and 203
2. USTs No. 1 through 3

The facility is located in an area of highly impermeable clay deposits that are about 140 feet thick. This clay unit does not have enough water-bearing capacity to characterize it as an aquifer. Ground water is obtained from the shale bedrock aquifer underlying the clay deposits, and is used as a drinking water source west and upgradient of the facility. Drinking water in the area of the site is primarily obtained from the St. Clair River located 1,400 feet east of the facility. The nearest surface water intakes are located about 1.75 miles north and upstream of the facility.

The potential for release to ground water, surface water, air, and on-site soils from most of the SWMUs is low because the units are maintained indoors and on concrete floors that are in good condition. However, the potential for a release to air from the Hazardous Waste Storage Area (SWMU 1) is moderate because the unit has no walls and is used to store highly volatile solvents; any accidental spill at the unit would result in a release to the air. In addition, the potential of a release to air from USTs No. 202 and 203 (AOC 1) was moderate because, at the time of the inspection, the concrete over the tanks was removed and solvent-contaminated soils were exposed and likely to volatilize. Releases to surface water have occurred in the past due to raw material solvent spills reaching facility storm water sewers; these sewers empty into an unnamed ditch, which flows into the St. Clair River. Subsurface soil and ground water contamination caused by leakage from underground storage tanks (UST) (AOCs 1 and 2) has been documented at the facility. At the time of the inspection, ATC was working on getting state approval for its remediation plans. ATC intends to replace the leaking USTs and remediate contamination at the facility.

PRC recommends closure activities for the Former Hazardous Waste Storage Area (SWMU 8) continue as scheduled. In addition, remedial activities planned for the leaking USTs (AOCs 1 and 2) should proceed as planned once those plans are approved by the state.

## 1.0 INTRODUCTION

PRC Environmental Management, Inc. (PRC), received Work Assignment No. R05032 from the U.S. Environmental Protection Agency (EPA) under Contract No. 68-W9-0006 (TES 9) to conduct preliminary assessments (PA) and visual site inspections (VSI) of hazardous waste treatment and storage facilities in Region 5.

As part of the EPA Region 5 Environmental Priorities Initiative, the RCRA and CERCLA programs are working together to identify and address RCRA facilities that have a high priority for corrective action using applicable RCRA and CERCLA authorities. The PA/VSI is the first step in the process of prioritizing facilities for corrective action. Through the PA/VSI process, enough information is obtained to characterize a facility's actual or potential releases to the environment from solid waste management units (SWMU) and areas of concern (AOC).

A SWMU is defined as any discernible unit at a RCRA facility in which solid wastes have been placed and from which hazardous constituents might migrate, regardless of whether the unit was intended to manage solid or hazardous waste.

The SWMU definition includes the following:

- RCRA-regulated units, such as container storage areas, tanks, surface impoundments, waste piles, land treatment units, landfills, incinerators, and underground injection wells
- Closed and abandoned units
- Recycling units, wastewater treatment units, and other units that EPA has usually exempted from standards applicable to hazardous waste management units
- Areas contaminated by routine and systematic releases of wastes or hazardous constituents. Such areas might include a wood preservative drippage area, a loading or unloading area, or an area where solvent used to wash large parts has continually dripped onto soils.

An AOC is defined as any area where a release to the environment of hazardous waste or constituents has occurred or is suspected to have occurred on a nonroutine and nonsystematic basis. This includes any area where a strong possibility exists that such a release might occur in the future.

The purpose of the PA is as follows:

- Identify SWMUs and AOCs at the facility
- Obtain information on the operational history of the facility
- Obtain information on releases from any units at the facility
- Identify data gaps and other informational needs to be filled during the VSI

The PA generally includes review of all relevant documents and files located at state offices and at the EPA Region 5 office in Chicago.

The purpose of the VSI is as follows:

- Identify SWMUs and AOCs not discovered during the PA
- Identify releases not discovered during the PA
- Provide a specific description of the environmental setting
- Provide information on release pathways and the potential for releases to each medium
- Confirm information obtained during the PA regarding operations, SWMUs, AOCs, and releases

The VSI includes interviewing appropriate facility staff; inspecting the entire facility to identify all SWMUs and AOCs; photographing all visible SWMUs; identifying evidence of releases; making a preliminary selection of potential sampling parameters and locations, if needed; and obtaining additional information necessary to complete the PA/VSI report.

This report documents the results of a PA/VSI of the American Tape Company (ATC) facility (EPA Identification No. MID 061 862 926) in Marysville, St. Clair County, Michigan. The PA was completed on March 5, 1992. PRC gathered and reviewed information from the Michigan Department of Natural Resources (MDNR) and from EPA Region 5 RCRA files. The VSI was conducted on March 25, 1992. It included interviews with a facility representative and a walk-through inspection of the facility. PRC identified nine SWMUs and two AOCs at the facility.

The VSI is summarized and nine inspection photographs are included in Attachment A. Field notes from the VSI are included in Attachment B.



## 2.0 FACILITY DESCRIPTION

This section describes the facility's location; past and present operations; waste generating processes and waste management practices; a history of documented releases; regulatory history; environmental setting; and receptors.

### 2.1 FACILITY LOCATION

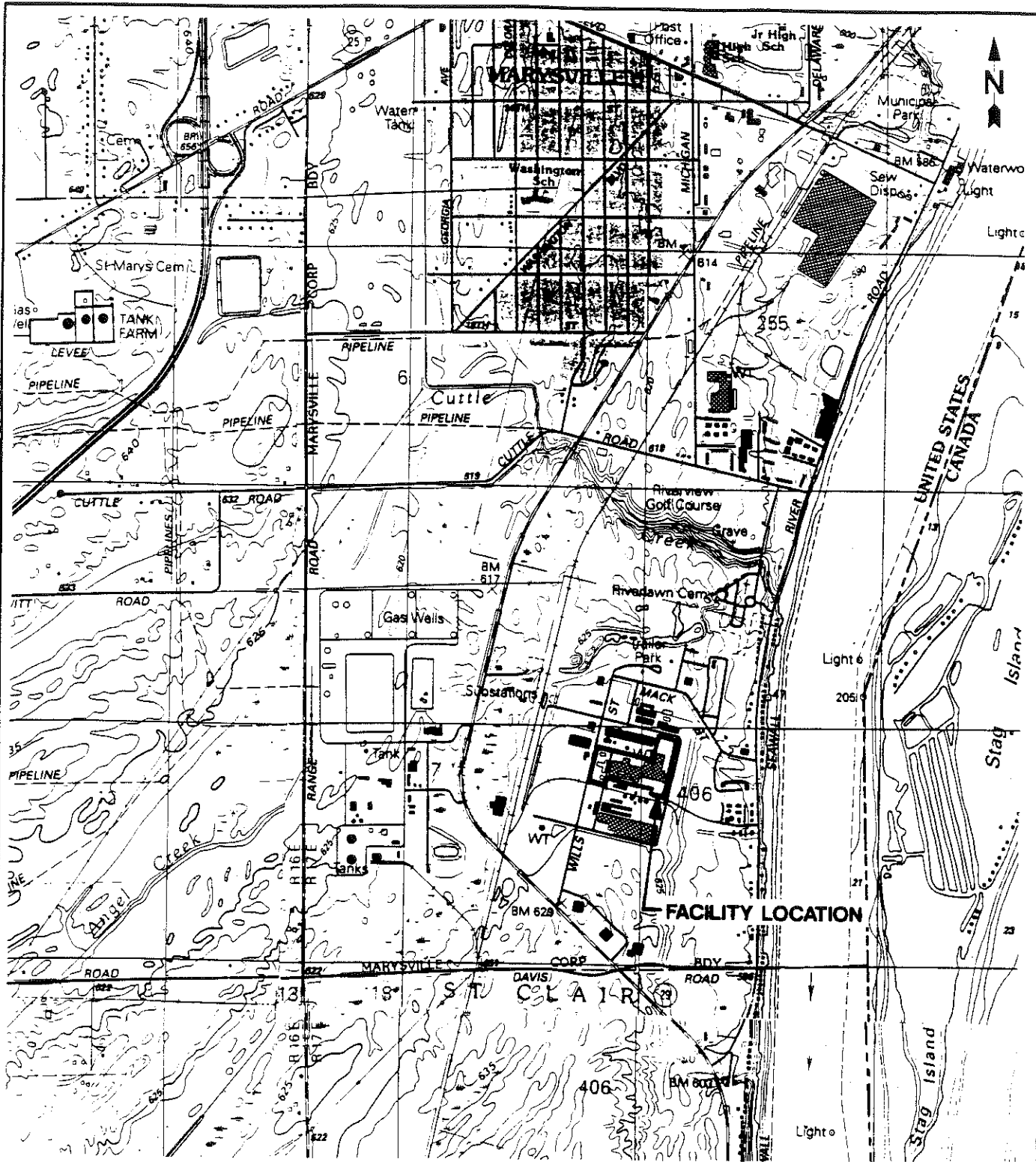
The ATC facility is located at 317 Kendall Avenue in Marysville, St. Clair County, Michigan. Figure 1 shows the location of the facility in relation to the surrounding topographic features (latitude 82° 28' 057" N and longitude 42° 53' 041" W). The facility occupies about 11.2 acres in the South Marysville Industrial Area industrial park.

The facility is bordered on the north by Kendall Avenue, a manufacturing facility, and a parking lot; on the west by Wills Street and an open lot; on the south by an open lot and an abandoned building; and on the east by Vicksburgh Street and an open lot. Mills Street bisects the facility.

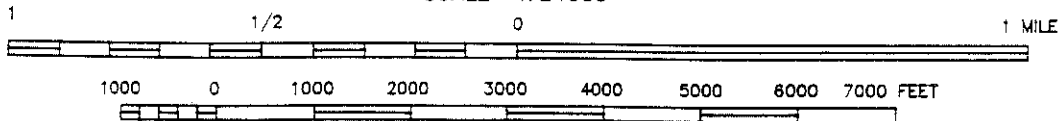
### 2.2 FACILITY OPERATIONS

The Dow Magnesium Corporation built the ATC facility during World War II and operated it as a munitions plant. After the war, the property was sold off in separate parcels to numerous parties as part of the Surplus Land Act of 1946. In 1962, American Pres-Stik Tape Company (APT) and K&K Investments (K&K) purchased the bulk of the facility and began tape manufacturing operations. In 1965, APT and K&K sold their operations to Armour Company (Armour) who continued to manufacture tape. In 1966, Armour purchased the warehouse parcel and expanded the facility. In January 1971, Armour sold the facility to the Armak Company who, in 1983, sold it to ATC. In July of 1990, ATC's stock was sold to the Seoul Trading Company of North America (STCNA), a Korean-based concern. Currently, STCNA owns the property and ATC operates the facility.

ATC manufactures pressure-sensitive, solvent-based adhesive tapes. The raw materials used during manufacturing and stored in warehouses include natural rubber, isopropanol, and rolls of tape. Solvents are used extensively and stored in underground storage tanks (UST).



SCALE 1:24000



SCALE: 1" = 2,000'

MICHIGAN

QUADRANGLE LOCATION

SOURCE: MODIFIED FROM U.S. GEOLOGICAL SURVEY  
PORT HURON, MICHIGAN - ONTARIO QUADRANGLE, 1991

AMERICAN TAPE COMPANY  
MARYSVILLE, MICHIGAN

**FIGURE 1**  
**FACILITY LOCATION**

**PAC** ENVIRONMENTAL MANAGEMENT, INC.

The manufacturing process consists of three stages: adhesive mixing, coating, and slitting. Natural rubber is the primary raw material for the adhesive mixing process. Zinc oxide and clay, which are purchased in bags, are added to the rubber and mixed. This mixture is pumped to a churn for more mixing and then stored in a warehouse in tote containers.

The coating process applies the adhesive to rolls of tape purchased off site, which are made of paper, film, or fiberglass. ATC operates three separate coating lines, depending on the type of tape being coated at the time, and nine drying ovens. As the rolls of tape are unwound, they receive a release coating on the back side, necessary in order to remove tape from a roll, and the adhesive coating on the front side. There are several different types of release coatings used at the ATC facility. Resins and solvents (xylene and toluene) are mixed to produce the release coating for most tapes. The release coating for reinforced tapes contains isopropanol. The release coating for some masking tapes is a water-based silicone. The coatings are dried in ovens and then the tape is wound up and stored. Solvent-laden air passes through a solvent recovery system at the coating lines. The solvent is recycled and used in making adhesives.

The rolls of coated tape become final product during the slitting process. The rolls are unwound and cut into finished sizes and rewound on individual cardboard cores. The rolls are dusted with plastic pellets to keep them from sticking together and are then wrapped in plastic. The wrapped bundles are packed into cartons and stored in a warehouse or shipped directly to the customer.

Solid wastes generated from ATC facility operations and the SWMUs where they are managed are discussed in detail in Section 2.3.

The ATC facility is comprised of four buildings: Building No. 7 used for maintenance and storage, Building No. 48 comprised of storage and a boiler plant, and the solvent recovery building are on the west side of Mills Street; and the manufacturing facility building is on the east side of Mills Street. This occupies approximately 650,000 square feet. The facility operates 3 shifts per day, 7 days per week, and employs about 340 people.

### **2.3 WASTE GENERATION AND MANAGEMENT**

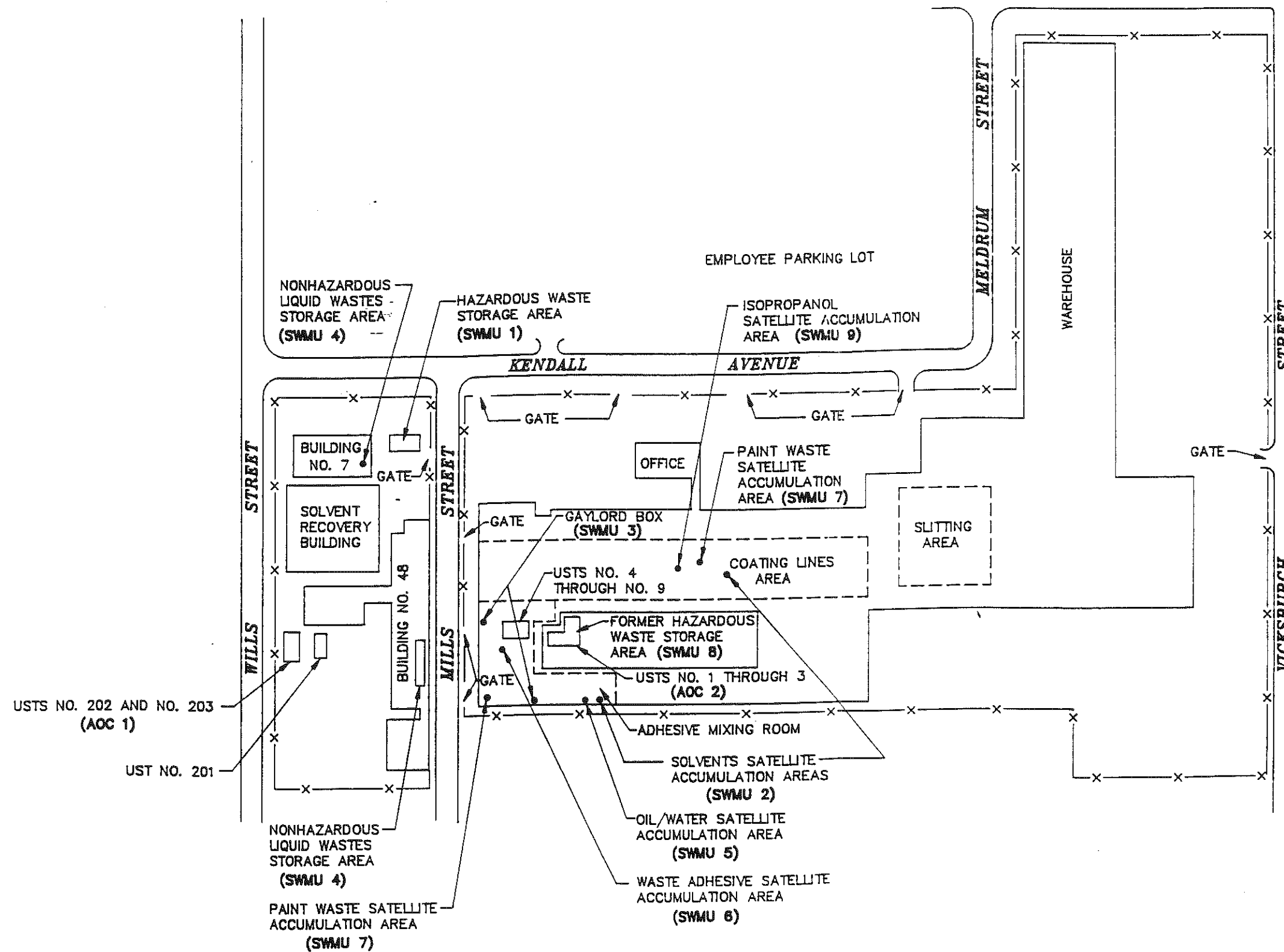
Wastes are generated and managed at various locations at the facility. SWMUs and their current status are identified in Table 1. The locations of SWMUs and AOCs in relation to the facility layout are shown in Figure 2. Wastes generated at the facility are summarized in Table 2. Facility generation and management of both hazardous and nonhazardous wastes are discussed below.

**TABLE 1**  
**SOLID WASTE MANAGEMENT UNITS**

<u>SWMU Number</u>	<u>SWMU Name</u>	<u>RCRA Hazardous Waste Management Unit<sup>a</sup></u>	<u>Status</u>
1	Hazardous Waste Storage Area	No	Active, storage of hazardous wastes for less than 90 days
2	Solvents Satellite Accumulation Areas	No	Active
3	Gaylord Boxes	No	Active
4	Nonhazardous Liquid Wastes Storage Areas	No	Active, storage of nonhazardous liquid wastes
5	Oil/Water Satellite Accumulation Area	No	Active, storage of oil and water mixture to separate oil and water
6	Waste Adhesive Satellite Accumulation Area	No	Active
7	Paint Waste Satellite Accumulation Areas	No	Active
8	Former Hazardous Waste Storage Area	Yes	Inactive as of 1990; undergoing RCRA closure
9	Isopropanol Satellite Accumulation Area	No	Active

Note:

<sup>a</sup> A RCRA hazardous waste management unit is one that currently requires or formerly required submittal of a RCRA Part A or Part B permit application.



NOT TO SCALE

PRC ENVIRONMENTAL MANAGEMENT, INC.

AMERICAN TAPE COMPANY  
MARYSVILLE, MICHIGAN

**FIGURE 2**  
**FACILITY LAYOUT**

SOURCE: MODIFIED FROM ARMAK COMPANY, 3/18/83 SKETCH, RECEIVED BY PRC, MARCH 1992.

**TABLE 2**  
**SOLID WASTES**

<u>Waste/EPA Waste Code<sup>a</sup></u>	<u>Source</u>	<u>Solid Waste Management Unit<sup>b</sup></u>
Solvent-contaminated waste oil/D001	Adhesive mixing process	1, 5, and 8
Waste Adhesive/D001	Adhesive mixing process	1, 6, and 8
Paint Waste/D001	Coating process	1, 7, and 8
Waste Isopropanol/D001	Coating process	1, 8 and 9
Silicone/NA	Coating process	4
Cleaning Rags and Filter Socks/D001 and F005	Adhesive mixing process, coating process	3
Resin Oven Drippings/NA	Coating process	4
Waste Water-Soluble Oil/NA	Slitting process	4
Waste Oil/NA	Vehicles and Machinery	4
Contaminated and Off-Specification Solvents/D001	Adhesive mixing process	1, 2, and 8
Oven Dust/NA	Slitting process	1
Spent Activated Carbon/NA	Solvent recovery	None

Notes:

- <sup>a</sup> Not applicable (NA) designates nonhazardous waste.
- <sup>b</sup> "None" indicates that the waste stream is not managed on site.

Primary waste streams routinely generated at the facility include solvent-contaminated waste oil (D001), waste adhesive (D001), paint waste (D001), waste isopropanol (D001), nonhazardous silicone, solvent-contaminated cleaning rags and filter socks (D001 and F005), nonhazardous resin oven drippings, nonhazardous waste water-soluble oil, and nonhazardous waste oil. Wastes generated on a nonroutine basis include contaminated and off-specification solvents (D001), nonhazardous oven dust, and nonhazardous spent activated carbon. All wastes are generated directly from the manufacturing process except for waste oils, which are generated indirectly from manufacturing machinery, and spent activated carbon which is generated from solvent recovery operations.

Prior to June 1990, solvent-contaminated waste oil (D001), waste adhesive (D001), paint waste (D001), waste isopropanol (D001), and contaminated or off-specification solvents (D001) were stored at the Former Hazardous Waste Storage Area (SWMU 8).

Oil drips from the moving parts of the adhesive mixing machinery into catch basins around the machinery. Condensate also drips from the machinery and mixes with the oil. Solvents splash into the catch basins during mixing and contaminates the water. This oil/water mixture is collected in 5-gallon buckets and placed in the Oil/Water Satellite Accumulation Area (SWMU 5). This unit consists of a 55-gallon drum and is used to separate the oil/water mixture. When the drum is full, the oil is drained from the bottom of the drum, placed into 5-gallon buckets and reworked into the machinery. The water is then drained from the unit into 5-gallon buckets, and transferred to 55-gallon drums at the Hazardous Waste Storage Area (SWMU 1) for less than 90-day storage. The water is transported off site as solvent-contaminated waste oil (D001) by Ross Transportation of Grafton, Ohio to the Ross Incineration Services incinerator in Grafton, Ohio to be incinerated.

Waste adhesive (D001) is generated when an adhesive batch can no longer be used as a coating. In addition, piping carrying adhesives is occasionally cleaned, also producing waste adhesive. These wastes are accumulated in a plastic-lined 55-gallon drum at the Waste Adhesive Satellite Accumulation Area (SWMU 6) and then stored for less than 90 days at the Hazardous Waste Storage Area (SWMU 1). The drums are transported off site by Ross Transportation of Grafton, Ohio to the Ross Incineration Services incinerator in Grafton.

Resins, which are purchased in bags, and solvents (xylene, toluene) are mixed to produce a release coating applied to the back of the tape. Residue at the bottom of 55-gallon drums used for mixing the release coating is disposed of as paint waste (D001). While these wastes are not paint, the facility refers to them as paint wastes because of their resin and solvent constituents. These wastes are consolidated in a Paint Waste Satellite Accumulation Area (SWMU 7) located in

the adhesive mixing room. Paint waste is also generated at the coating lines and stored in a second Paint Waste Satellite Accumulation Area (SWMU 7). All drums of paint waste are then stored for less than 90 days in the Hazardous Waste Storage Area (SWMU 1). About 18,550 gallons were generated in 1991. The drums are transported off site by Ross Transportation of Grafton, Ohio to the Ross Incineration Services incinerator in Grafton.

Isopropanol is used as a release coating for reinforced tape. Waste isopropanol (D001) is generated at various points along the coating lines and stored in 55-gallon drums at the Isopropanol Satellite Accumulation Area (SWMU 9). When a drum is full, it is covered and transferred to the Hazardous Waste Storage Area (SWMU 1). About 292 gallons were generated in 1991. Laidlaw Environmental Services of Corunna, Ontario, Canada transports the wastes to their liquid injection incinerator in Corunna.

A water-based silicone release coating is applied to paper masking tape lines. Nonhazardous waste silicone is generated from residuals and drippings at the coating lines. The wastes are accumulated in 55-gallon drums and stored in 275-gallon plastic tanks enclosed in 4-foot by 4-foot by 4-foot cardboard boxes at the Nonhazardous Liquid Wastes Storage Area (SWMU 4) in Building No. 48. Laidlaw Environmental Services of Corunna, Ontario, Canada empties the containers and transports the wastes to their liquid injection incinerator in Corunna.

Solvent-saturated cleaning rags (D001 and F005) are generated throughout the facility during daily cleanup operations around all machinery. These wastes are disposed of in Gaylord Boxes (SWMU 3) which are 4-foot by 4-foot by 4-foot high plastic-lined boxes situated in two areas of the facility. Gaylord Boxes (SWMU 3) are also used for the disposal of filter socks (D001 and F005). Filter socks are generated at several filtering stations used to screen particulates from the adhesive. The rags, filter socks, and empty resin bags are all disposed of in Gaylord Boxes (SWMU 3). The boxes are transported off site and manifested as contaminated debris by Ross Transportation of Grafton, Ohio to the Ross Incineration Services incinerator in Grafton, Ohio.

Nonhazardous resin oven drippings are generated at the coating lines from the ovens' extreme heat, which liberates oils and resins. The drippings are collected in 55-gallon drums and stored at the Nonhazardous Liquid Wastes Storage Area (SWMU 4) in Building No. 7. The drums are emptied and the wastes are transported off site in tanker trucks by Ross Transportation of Grafton, Ohio to the Ross Incineration Services incinerator in Grafton.

A nonhazardous waste water-soluble oil is a lubricating solution generated from the cutting knives of the slitter machinery. These wastes are accumulated in 55-gallon drums and



then stored at the Nonhazardous Liquid Wastes Storage Area (SWMU 4) in Building No. 48. Laidlaw Environmental Services of Corunna, Ontario, Canada empties the containers and transports the wastes to their liquid injection incinerator in Corunna.

Nonhazardous waste oil is generated from maintenance on facility vehicles and machinery. This waste is stored in 55-gallon drums in the Nonhazardous Liquid Wastes Storage Area (SWMU 4) in Building No. 7. Safety-Kleen of Pontiac, Michigan collects the waste oil, manifests it as nonhazardous liquid waste, and transports it to their bulking facility in Pontiac, Michigan. The oil is then transported by railroad car to Safety-Kleen fuel blending facility in East Chicago, Indiana.

Occasionally, contaminated and off-specification solvents (D001) are generated. Waste solvents generated during adhesive production are accumulated at the Solvents Satellite Accumulation Area (SWMU 2) and stored at the Hazardous Waste Storage Area (SWMU 1). Solvents are also generated at the solvent recovery building. When the solvents become too dirty to reuse, they are immediately placed in 55-gallon drums and stored at the Hazardous Waste Storage Area (SWMU 1). When the facility receives a batch of off-specification solvents, they are immediately stored in the 55-gallon containers in which they came, as is the case with xylene, or they are transferred into 55-gallon drums from storage tanks and stored at the Hazardous Waste Storage Area (SWMU 1). Laidlaw Environmental Services of Corunna, Ontario, Canada, transports the wastes to their liquid injection incinerator.

Nonhazardous oven dust is generated during oven cleaning at a coating line. Deposits build up in the drying ovens from burning solvent-laden air. This dust contains zinc, but is not a hazardous waste. The oven dust is collected once a year during facility shutdown in 55-gallon drums and stored at the Hazardous Waste Storage Area (SWMU 1). The drums are transported off site by Ross Transportation of Grafton, Ohio to the Ross Incineration Services incinerator in Grafton.

The solvent recovery system uses four fixed-bed carbon absorption units, which were installed in 1982. In 1988, all carbon was removed from two of the units and regenerated by Envirotrol, Inc. of Sewickley, Pennsylvania. In 1989, all carbon was removed from the other two units and replaced with virgin material by Envirotrol, Inc.

## **2.4 HISTORY OF DOCUMENTED RELEASES**

This section discusses the history of documented releases to ground water, surface water, air, and on-site soils at the facility.

On June 30, 1983, a 25-gallon solvent spill occurred due to overfilling of an UST in the area of UST No. 1 through 3 (AOC 2). The spill entered facility storm sewers which empty into an unnamed ditch located off site about 660 feet east of the facility. This ditch flowed into the St. Clair River until 1991 when it was replaced by a storm water sewer line that flows into the St. Clair River. The spill was contained using a floating boom and cleaned up from the ditch. The facility contacted MDNR and the Marysville Fire Department. No information is available on whether any regulatory action occurred (ATC, 1983c).

On November 16, 1983 about 100 gallons of toluene were spilled at USTs No. 1 through 3 (AOC 2). The spill occurred when a loading hose came off the tanker truck delivering the solvent. The facility covered storm drains with plastic and sand, but toluene had already entered the sewer system. Weirs were placed into the off site unnamed ditch to contain the spill, which was cleaned up within 2.5 hours. The facility contacted the Marysville Fire Department and MDNR. The facility took several actions recommended by MDNR to prevent this type of spill from occurring in the future (ATC, 1983d; MDNR 1983).

On April 3, 1986, a 100-gallon volatile chemicals mixture spill occurred indoors due to a hose uncoupling from a diaphragm pump. About 20 gallons entered facility storm sewers through cracks around a floor-drain standpipe. The facility flushed the drain with water and sampled the off site unnamed ditch. The spill reached the ditch, but no action was taken to clean up the spill. No documentation exists whether the spill reached the St. Clair River. The facility contacted the U.S Coast Guard (USCG) and MDNR (ATC, 1986).

On April 20, 1988, a 600-gallon toluene spill occurred due to human error during solvent delivery at UST No. 2 (AOC 2). The facility estimated that about 300 gallons entered facility storm drains, the off site unnamed ditch, and the St. Clair River. The facility placed weirs at the sewer discharge area in the ditch to contain the spill. Marine Pollution Control cleaned up the spill using absorbent sweeps, pumps, and weirs. The facility notified USCG, MDNR, and the Marysville Fire Department. MDNR personnel approved the cleanup and directed the facility to dispose of on-site soil affected by the spill (ATC, 1988; MDNR, 1988b). USCG fined the facility \$600.00 for violating the Federal Water Pollution Control Act (USCG, 1989). The facility contracted Great Lakes Environmental (GLE) to excavate the contaminated soil. GLE tested the soil and did not detect solvents. The soil was drummed and disposed of off site by Wayne Disposal, Inc. of Dearborn Michigan at a Class II landfill in Wayne County, Michigan (ATC, 1989b).

On September 27, 1988, a 150-gallon toluene spill occurred in the area of USTs No. 1 through 3 (AOC 2) due to the rupture of a coupling hose. The spill entered facility storm sewers and the off site unnamed ditch. The spill was contained in the ditch using absorbent pads and weirs (MDNR, 1988c). No information is available on whether any enforcement action occurred.

On April 18, 1989, a 348-gallon liquid silicone spill occurred due to the failure of an overflow alarm during tank filling. The spill entered facility storm sewers, the off site unnamed ditch, and the St. Clair River. The facility flushed the storm sewer to dilute the liquid and replaced the alarm (MDNR, 1989b). No information is available on whether any enforcement action occurred.

In 1990, the city of Marysville replaced the off site unnamed ditch with an underground storm water sewer. The new sewer is connected to facility storm water sewers and leads directly to the St. Clair River. The new sewer was constructed to have a high-retention time in case of future spills at the facility. The unnamed ditch no longer exists (PRC, 1992).

On April 26, 1991, a 10-gallon nonhazardous, diluted, polyvinyl acetate emulsions material spill occurred due to human error. The spill entered facility storm sewers. The storm drain was flushed with water. The facility contacted USCG, MDNR, EPA, Michigan Department of Public Health, the St. Clair County Emergency Preparedness Officer, and the Marysville Fire Department (ATC, 1991). No information is available on whether any enforcement action occurred.

Directly beneath the Former Hazardous Waste Storage Area (SWMU 8) are USTs No. 1 through 3 (AOC 2), once used for storing product toluene and rubber solvent. These 12,000-gallon steel tanks were installed in the late 1960s and have apparently contributed to the ground water and soil contamination in the area. In July 1991, all the tanks were closed in place. Closure consisted of emptying the tanks, cleaning them, and filling them with cement; no pressure-testing occurred (PRC, 1992).

ATC contracted with Techna Corporation (Techna) of Plymouth, Michigan, to perform UST closure activities at the facility. Sampling of subsurface soils beneath the Former Hazardous Waste Storage Area (SWMU 8) in July 1990, identified elevated levels of benzene, toluene, ethyl benzene, and xylene (Techna, 1991). The Former Hazardous Waste Storage Area (SWMU 8) was used to store solvent-contaminated waste oil (D001), waste adhesive (D001), paint waste (D001), waste isopropanol (D001), and contaminated and off-specification solvents (D001). Numerous spills of raw material toluene and rubber solvents have occurred at USTs No. 1 through 3 (AOC 2) located directly beneath the Former Hazardous Waste Storage Area (SWMU 8). Therefore, the

contamination identified was associated with the USTs rather than the storage area. As a consequence, Techna submitted an amended closure plan to the state to address the contamination in conjunction with the RCRA closure of the Former Hazardous Waste Storage Area (SWMU 8), which is located above the USTs. Currently, the facility plans to delineate the extent of contamination, pump and treat the ground water, and perform in situ remediation of the soil pending state approval of the amended closure plan.

USTs No. 4 through 9 are raw material tanks located directly west of USTs No. 1 through 3 (AOC 2) and under a facility building. Two 12,000-gallon steel tanks stored blended solvent, one 12,000-gallon steel tank stored process oil, one 10,000-gallon steel tank stored isopropanol, and one 2,000-gallon steel tank and one 8,000-gallon tank were empty. All of these tanks were installed in the late 1960s and closed in place in July 1990. Closure consisted of emptying the tanks, cleaning them, and filling them with cement; no pressure-testing occurred (PRC, 1992).

In July 1990, Techna also discovered VOC ground water and soil contamination at USTs No. 202 and 203 (AOC 1) once used for storing virgin and recovered solvents. The discovery was made when the facility removed the concrete slab over the tanks to install new fill ports (PRC, 1992). Apparently the tanks leaked recovered and virgin solvents. The facility notified MDNR and the Marysville Fire Department (PRC, 1992). These 20,000-gallon steel tanks were installed in 1982. The tanks were removed in June 1992 along with UST No. 201. New underground storage tanks have been installed at the location of UST No. 201. The new tanks are double-walled, with interstitial monitoring, constructed of a fiberglass composite outer wall, and lined with an epoxy coating. The facility plans to remediate the soil via in situ air stripping pending state approval (PRC, 1992).

Directly east of USTs No. 202 and 203 (AOC 1) was UST No. 201. This tank was a 30,000-gallon steel tank used to store No. 2 fuel oil. This tank was installed in 1982, filled once, and never used. This tank was not leak-tested, and it was excavated in June 1992 along with USTs No. 202 and 203 (AOC 1). The new USTs have been installed in the area of this tank (PRC, 1992).

## **2.5 REGULATORY HISTORY**

The Armak Company submitted a Notification of Hazardous Waste Activity form to EPA on August 18, 1980 (Armak, 1980). ATC submitted a RCRA Part A permit application on April 29, 1983, listing container storage (S01) of an unspecified capacity for D001 waste (ATC, 1983a). EPA notified the facility of its design capacity omission (EPA, 1983). The facility

responded with a revised Part A indicating the design capacity of the container storage area to be 12,000 gallons (ATC, 1983b).

MDNR conducted RCRA facility inspections at the ATC facility on October 22, 1985; February 25, 1988; March 8, 1989; March 29, 1990; and March 19, 1991 (MDNR, 1985; MDNR, 1988a; MDNR, 1989a; MDNR 1990a; and MDNR 1991a). All but the first inspection resulted in a notice of violations from the State of Michigan. Most violations involved improper labeling of waste containers and paperwork deficiencies. The March 19, 1991 inspection cited the company for excessive amounts of waste at a satellite accumulation area (probably SWMU 6) (MDNR, 1991a). MDNR also showed concern over inadequate secondary containment structure and poor housekeeping efforts around the storage area. The facility addressed all violations in a timely manner and MDNR determined that the violations had been properly corrected (MDNR, 1991b).

On June 21, 1988, the facility submitted a TSD operating license application for the Former Hazardous Waste Storage Area (SWMU 8). By March 23, 1989, the facility requested to withdraw its operating license application and instead develop a Part A Closure Plan for the storage area (ATC, 1989a).

The ATC facility submitted its closure plan for the Former Hazardous Waste Storage Area (SWMU 8) on June 29, 1989. The facility submitted a revised closure plan on April 19, 1990, which was approved by MDNR on June 15, 1990 (MDNR, 1990b). In June 1990 the ATC facility opened the Hazardous Waste Storage Area (SWMU 1) for less than 90-day storage of hazardous waste only.

The facility contracted with Techna to implement the approved closure plan. Sampling of subsurface soils beneath the Former Hazardous Waste Storage Area (SWMU 8) in July 1990, identified elevated levels of benzene, toluene, ethyl benzene, and xylene (Techna, 1991). The Former Hazardous Waste Storage Area (SWMU 8) was used to store solvent-contaminated waste oil (D001), waste adhesive (D001), paint waste (D001), waste isopropanol (D001), and contaminated and off-specification solvents (D001). Numerous spills of raw material toluene and rubber solvents have occurred at USTs No. 1 through 3 (AOC 2) located directly beneath the Former Hazardous Waste Storage Area (SWMU 8). Therefore, the contamination identified was associated with the USTs rather than the storage area. On April 29, 1991, Techna submitted an amendment to the closure plan to pump and treat contaminated ground water and in situ remediation of contaminated soils (Techna, 1991). At the time of the VSI, the Former Hazardous Waste Storage Area (SWMU 8) had not been closed.

The facility currently operates as a Large Quantity Generator due to the large amounts of paint waste (D001) and waste adhesive (D001) generated. These wastes are stored for less than 90 days at the Hazardous Waste Storage Area (SWMU 1). The facility is currently regulated as a TSD facility pending closure of the Former Hazardous Waste Storage Area (SWMU 8).

The facility currently has five operating air permits regulating: Coating Line No. 4; coating and drying ovens for Lines No. 1, 3 and a pilot line; a boiler; the Solvent Recovery Unit; and a spray booth. The facility has not violated its air permits. The facility has no history of odor complaints from workers or area residents.

The facility currently has one National Pollutant Discharge Elimination System (NPDES) permit, No. MI 0039021, for Outfall No. 001 to the St. Clair River, located about 1,400 feet east of the facility. ATC discharges about 1,000 gallons of water per day from cooling tower bleed-off and boiler condensate. All water discharged from the outfall is non-contact water. Since late 1990, facility floor drains and storm sewers empty into a storm water sewer line which flows into the St. Clair River. Prior to late 1990, storm water sewers and floor drains emptied into an unnamed ditch located 660 feet east of the facility. While there have been releases to the former unnamed ditch (see Section 2.4), the facility has not violated its NPDES permit requirements.

## **2.6 ENVIRONMENTAL SETTING**

This section describes the climate; flood plain and surface water; geology and soils; and ground water in the vicinity of the facility.

### **2.6.1 Climate**

The climate in the St. Clair County area is temperate and influenced by the location with respect to major storm tracks and the Great Lakes. The average daily temperature is 48.5 degrees Fahrenheit (°F). The lowest average daily temperature is 22°F in January. The highest average daily temperature is 72°F in July [U.S. Department of Commerce (USDC), 1989].

The total annual precipitation for the area is 32 inches (USDC, 1989). The mean lake evaporation for the area is about 30 inches. The 1-year, 24-hour maximum rainfall is about 2 inches (USDC, 1968).

The prevailing wind is from the southwest. Average wind speed is highest in November at 8.9 miles per hour (USDC, 1989).

### **2.6.2 Flood Plain and Surface Water**

The ATC facility is not in a flood-prone area. The facility lies outside of the flood plain of the St. Clair River, located 1,400 feet east of the facility (Techna, 1988). This surface water body is used for municipal water supply, industrial, irrigation, and recreational purposes. The St. Clair River flows south to Lake St. Clair which ultimately flows into Lake Erie.

The ATC facility is mostly flat and paved. Storm water runoff drainage is directed towards storm sewers throughout the facility. The storm sewers formerly led to an off site unnamed drainage ditch which flowed into the St. Clair River. In late 1990, the city of Marysville replaced the ditch with a storm sewer line directly from the facility to the St. Clair River. Facility sanitary sewers are connected to the city of Marysville sanitary sewers, which flow to the Marysville water treatment plant located 1.5 miles north of the facility.

### **2.6.3 Geology and Soils**

On-site soils have been characterized by Warzyn during borehole development for a Phase II environmental assessment of the ATC facility. Fill material overlies the natural soils of the area. The fill material consists of sand with varying amounts of silt and gravel, and ranges from 2 to 13 feet in thickness. Underlying the fill is a 140-foot thick layer of silty clay. This Pleistocene age material consists of lacustrine clays deposited in a post-glacial lake (Warzyn, 1990).

Mississippian age shale bedrock underlies the Pleistocene glacial deposits. This shale bedrock is of the Bedford and Antrim formations (Warzyn, 1990).

### **2.6.4 Ground Water**

Ground water encountered at the ATC facility is primarily perched in the sandy fill material. The sandy fill is located in pockets across the facility which do not appear to be hydraulically connected, nor do they contain amounts of water significant enough to justify defining them as aquifers (Warzyn, 1990). The clay underlying the fill material does not produce significant amounts of water. Therefore, the bedrock shale is the only aquifer in the area of the site. As discussed in Section 2.4, contamination of perched ground water in the fill has been documented at the site. However, none has been documented in the clay (Warzyn, 1990). Currently the facility plans to pump and treat contaminated ground water pending state approval of remediation plans.

Regional ground water flow direction is east toward the St. Clair River (Warzyn, 1990). The St. Clair River is about 25 feet deep in the vicinity of the facility (USGS, 1991). Therefore, the river is most likely a recharging area for the bedrock aquifer and a discharge area for water-bearing units above and perched in the unconsolidated clay material.

## 2.7 RECEPTORS

The ATC facility is located at 317 Kendall Avenue in Marysville, St. Clair County, Michigan. The facility occupies about 11.2 acres in the South Marysville Industrial Area industrial park. Marysville has a population of about 9,400 people (Marysville Chamber of Commerce, 1992).

The facility is bordered on the north by Kendall Avenue, a manufacturing facility, and a parking lot; on the west by Wills Street and an open lot; on the south by an open lot and an abandoned building; and on the east by Vicksburgh Street and an open lot. The nearest residential area is located about 0.25 mile north of the facility. The nearest school is located about 1.5 miles north of the facility.

The facility is surrounded by a fence and access is controlled by a gate during business hours. Visitors must sign in and have an escort within the facility.

The nearest surface water body, the St. Clair River, is located about 1,400 feet east of the facility and is used for municipal water supply, industrial, irrigation, and recreational purposes. The city of Marysville obtains its drinking water from the St. Clair River from intakes located about 1.75 miles north and upstream of the facility (Marysville Water Department, 1992). The city of St. Clair obtains its drinking water from the St. Clair River from intakes located about 4 miles south and downstream from the facility; this is the nearest drinking water intake downstream from the facility. The St. Clair River Country Club has an intake for irrigation purposes located almost 2 miles downstream from the facility (St. Clair Water Department, 1992). Other surface water bodies in the area include Cuttle Creek, which is located about 0.5 mile north of the facility and flows into the St. Clair River.

Ground water is used for drinking water purposes within a 3-mile radius of the facility. Households existing outside of the municipal water distribution boundaries and west of the facility use ground water obtained from the bedrock aquifer for drinking water purposes (Marysville Water Department, 1992). The nearest drinking water well is located about 1.5 miles west and upgradient from the facility. No ground water wells are known to exist downgradient



of the facility. No industrial wells are known to exist within a 3-mile radius of the site (Marysville Water Department, 1992).

No sensitive environments exist at the facility. A 20-acre wetland is located 0.25 mile west of the facility and another 20-acre wetland is located 0.5 mile southwest of the facility (USGS, 1991). From observations made during the VSI, these wetlands are poorly drained, low areas most likely situated in the impermeable clay of the region. A proposed threatened or endangered species listed for St. Clair County is the Eastern prairie fringed orchid, whose habitat includes wet grasslands (U.S. Fish and Wildlife Service, 1989).

### 3.0 SOLID WASTE MANAGEMENT UNITS

This section describes the nine SWMUs identified during the PA/VSI. The following information is presented for each SWMU: description of the unit, dates of operation, wastes managed, release controls, history of documented releases, and PRC's observations. Figure 2 shows the SWMU locations.

#### **SWMU 1**

#### **Hazardous Waste Storage Area**

##### **Unit Description:**

This unit is located outdoors at the northwest corner of the facility. The unit measures 30 feet by 15 feet and is constructed of a concrete floor and a roof. To contain spills, the floor slopes up at the entrance and has a 6.5-inch concrete berm at the back and along the sides. The unit is surrounded by a 6-foot high chain-link fence that is padlocked at all times. The fence does not have barbed wire but is posted with danger signs.

##### **Date of Startup:**

This unit began operation in June 1990.

##### **Date of Closure:**

This unit is active for less than 90-day storage of hazardous waste.

##### **Wastes Managed:**

This unit manages paint waste (D001), waste isopropanol (D001), waste adhesive (D001), solvent-contaminated waste oil (D001), contaminated and off-specification solvents (D001), and oven dust in 55-gallon drums on pallets. All wastes are transported off site and incinerated.

##### **Release Controls:**

The concrete floor of the unit is sloped at the front and has a 6.5-inch berm to contain spills. The unit has a sump with no outlet in the northeast corner for accumulating precipitation. Any spill of hazardous substances would only enter the sump. Drums are bound together to prevent tipping, covered with plastic, and stored on pallets.

##### **History of Documented Releases:**

No releases from this SWMU have been documented.

**Observations:** The storage area is new and appeared to be in very good condition. Ten 55-gallon drums were in storage at the time of the inspection. Four contained off-specification solvents, three contained waste adhesive, and three contained solvent-contaminated oil. PRC noted no evidence of release (see Photograph No 1).

## **SWMU 2**

### **Solvents Satellite Accumulation Area**

**Unit Description:** This unit consists of 55-gallon steel drums equipped with funnels and located indoors in the adhesive mixing and coating areas. The drums are stored on the floor indoors. No floor drains were present near the area of the unit observed.

**Date of Startup:** This unit began operation in 1983.

**Date of Closure:** This unit is active.

**Wastes Managed:** This unit manages contaminated solvents (D001) generated during the production of adhesives and application of release coatings. When full, the drums are moved for less than 90-day storage at the Hazardous Waste Storage Area (SWMU 1). The drums are ultimately transported off site and the wastes are incinerated.

**Release Controls:** The unit is located indoors, on a concrete floor with no floor drains in the area.

**History of Documented Releases:** No releases from this SWMU have been documented.

**Observations:** The drum observed during the inspection appeared to be in good condition. The funnel in one of the drums was open (see Photograph No. 2).

## **SWMU 3**

### **Gaylord Boxes**

**Unit Description:** This unit consists of boxes located indoors at two locations in the adhesive manufacturing area of the facility. Each is a 4-foot by 4-foot by 4-foot cardboard box lined with plastic and equipped with

Date of Startup: The facility began using these boxes in mid 1991.

Date of Closure: This unit is active.

Wastes Managed: This unit manages solvent-contaminated cleaning rags (D001 and F005), dirty adhesive filter socks (D001 and F005), and occasional refuse such as resin bags. The boxes are manifested as contaminated debris transported off site, and incinerated along with their wastes.

Release Controls: The boxes are lined with plastic, covered with a lid, and stored indoors. The boxes are not stored near floor drains.

History of Documented Releases: No releases from this SWMU have been documented.

Observations: Fire extinguishers were located near the boxes. The floor did not appear to have substantial cracks and no floor drains were observed. PRC was told that the boxes contained filter socks at the time of the inspection. PRC did not look into the boxes to observe the amount of waste accumulated in them. PRC noted no evidence of release (see Photograph No. 3).

### Nonhazardous Liquid Wastes Storage Area

22

Date of Startup: These units began operation in 1986.

Date of Closure: These units are active.

Wastes Managed: These units manage nonhazardous waste silicone, nonhazardous waste water-soluble oil, nonhazardous resin oven drippings, and nonhazardous waste oil. All of these liquid wastes are transported off site and incinerated, except for waste oil, which is transported off site for fuel blending.

Release Controls: This unit is located indoors on a concrete floor.

History of Documented Releases: No releases from this SWMU have been documented.

Observations: At the time of the inspection 19 boxes and 65 drums were in this unit in Building 48 (see Photograph Nos. 4 and 5). About half of the boxes appeared to be full, only 3 of the drums were empty, and one drum contained silicone. PRC did not observe the unit in Building No. 7.

#### **SWMU 5**

#### **Oil/Water Satellite Accumulation Area**

Unit Description: This unit is a 55-gallon drum stored on its side on a stand indoors in the adhesive mixing room. A funnel is inserted into a hole to pour an oil/water mixture into the drum. The stand is about 1.5 feet high which enables a 5-gallon bucket to be placed under a spigot located in the drum's bung. The drum is on its side in order to separate oil and water placed in the drum. The water is poured out of the drum through the spigot into the bucket, moved to the Hazardous Waste Storage Area (SWMU 1), and disposed of off site. The oil is removed from the drum and reused in the mixing equipment.

Date of Startup: This unit began operation in 1983.

Date of Closure: This unit is active.

**Wastes Managed:** This unit manages an oil and water mixture generated from mixing equipment. The unit is used to separate the oil and water in order to reuse the oil and dispose of the water. The oil is reused in the mixing equipment. The water is placed in 55-gallon drums stored at the Hazardous Waste Storage Area (SWMU 1). The facility refers to this waste as solvent-contaminated oil (D001). The drums are transported off site and incinerated.

**Release Controls:** The unit is located indoors on a concrete floor with no drains in the area.

**History of Documented Releases:** No releases from this SWMU have been documented.

**Observations:** At the time of the inspection, some oil/water mixture was being poured into the unit. The unit was about half full, probably mostly oil. The unit appeared to be in good condition. No cracks in the floor were visible. PRC observed no evidence of release (see Photograph No. 2).

**SWMU 6                      Waste Adhesive Satellite Accumulation Area**

**Unit Description:** This unit is a 55-gallon drum with a plastic liner placed on a rolling base to move it to wherever it is needed. The unit is maintained in the adhesive mixing area of the facility to manage waste adhesive.

**Date of Startup:** This unit began operation in 1983.

**Date of Closure:** The unit is currently active.

**Wastes Managed:** This unit manages waste adhesives (D001). The adhesives are placed in the unit directly, or come from filter socks which are allowed to drip adhesive into the unit prior to disposing of the socks in a Gaylord Box (SWMU 3). When full, the unit is closed and moved to the Hazardous Waste Storage Area (SWMU 1). The wastes are stored at SWMU 1 for less than 90 days and transported off site for incineration.

**Release Controls:** The unit is lined with plastic and maintained indoors on concrete floors.

**History of Documented Releases:** No releases from this SWMU have been documented.

**Observations:** At the time of the inspection, one drum was about one-tenth full. It had a filter sock dripping into it (see Photograph No. 6). Another drum was full and awaiting transfer to the Hazardous Waste Storage Area (SWMU 1). Although the floor in the adhesive mixing room had numerous pock marks, it had been painted, which appeared to be acting as a sealant. No release from this unit was observed.

**SWMU 7                      Paint Waste Satellite Accumulation Areas**

**Unit Description:** This unit consists of 55-gallon drums located in the adhesive mixing room and near the coating lines. These drums are used to accumulate residues from 55-gallon drums used for mixing resins and solvents to produce release coating. The facility refers to this waste as paint waste (D001).

**Date of Startup:** This unit began operation in 1990.

**Date of Closure:** The unit is active.

**Wastes Managed:** This unit manages paint wastes (D001) which are generated from a release coating produced by mixing resins and solvents. The wastes are accumulated in the adhesive mixing room and by the coating lines. The drums of paint waste are then transferred to the Hazardous Waste Storage Area (SWMU 1) and stored for less than 90 days. The wastes are ultimately transported off site and incinerated.

**Release Controls:** The drums are stored indoors and on concrete floors. No cracks in the floors or floor drains were observed in the area of the drums.

**History of  
Documented Releases:**

No releases from this SWMU have been documented.

**Observations:**

At the time of the inspection, one 55-gallon drum of waste in the adhesive mixing room was full, closed, and ready to be transferred to the Hazardous Waste Storage Area (SWMU 1). The facility representative requested that PRC not take a photograph of the drums in the adhesive mixing room because of flammability of the area. PRC did not observe the drums in use near the coating lines. Although the floor in the adhesive mixing room had numerous pock marks, it had been painted, which appeared to be acting as a sealant. No release from this unit was observed .

**SWMU 8**

**Former Hazardous Waste Storage Area**

**Unit Description:**

This former unit was located outside in a courtyard. The unit measured approximately 21 feet by 37 feet and was enclosed by a fence. This unit was used to store hazardous wastes generated at the facility in 55-gallon drums. The drums were stored in secondary containment pans placed on a concrete pad. The unit was located above USTs No. 1 through 3 (AOC 2).

**Date of Startup:**

This unit began operation in April 1983.

**Date of Closure:**

The unit became inactive in June 1990, and RCRA closure activities began in November 1990 and are currently ongoing.

**Wastes Managed:**

Prior to June 1990, solvent-contaminated waste oil (D001), waste adhesive (D001), paint waste (D001), waste isopropanol (D001), and contaminated or off-specification solvents (D001) were stored at this unit. The wastes were transported off site and incinerated.

**Release Controls:**

The drums were stored in secondary containment pans placed on a concrete pad.

**History of  
Documented Releases:**

The releases in the area of this unit are apparently attributable to USTs No. 1 through 3 (AOC 2).



Observations: At the time of the inspection, the unit no longer existed. The courtyard is composed of gravel. No remedial activities had yet begun. There was no evidence of past releases (see Photograph No. 7).

**SWMU 9**

### Isopropanol Satellite Accumulation Area

Unit Description: This unit consists of 55-gallon drums located near the coating lines. The unit is used to accumulate waste isopropanol (D001) used to produce a release coating.

Date of Startup: This unit began operation in 1983.

Date of Closure: The unit is active.

Wastes Managed: This unit manages waste isopropanol (D001) used as a release coating. The wastes are accumulated by the coating lines. The drums of waste are then transferred to the Hazardous Waste Storage Area (SWMU 1) and stored for less than 90 days. The wastes are transported off site and incinerated.

Release Controls: The drums are stored indoors and on concrete floors.

History of Documented Releases: No releases from this SWMU have been documented.

Observations: At the time of the inspection, no drums of waste isopropanol were accumulating. Therefore, no photograph was taken of the unit.

#### 4.0 AREAS OF CONCERN

PRC identified two AOCs during the PA/VSI. These AOCs are discussed below; their locations are shown in Figure 2.

##### AOC 1      USTs No. 202 and 203

USTs No. 202 and 203 are an AOC because they have leaked solvent material. These 20,000-gallon steel tanks were installed in 1982 to store recovered and virgin solvents. ATC notified MDNR of the leaking tanks and excavated the tanks in June 1992. The facility plans to pump and treat the contaminated ground water and remediate the contaminated soil via in situ air stripping pending state approval. New solvent storage tanks have been installed at the location of UST No. 201. At the time of the inspection, the tanks were in the early stages of removal (see Photograph No. 8). ATC retained the services of Techna to manage this project.

##### AOC 2      USTs No. 1 through 3

USTs No. 1 through 3 are an AOC because they have leaked solvents and have been involved with numerous spills at the facility. These 12,000-gallon steel tanks were installed in the late 1960s to store toluene and rubber solvent. In 1990, the tanks were emptied, cleaned, and filled with cement. ATC notified MDNR of the leaking tanks and plans to pump and treat the ground water and perform in situ treatment of contaminated soil in conjunction with the RCRA closure of the Former Hazardous Waste Storage Area (SWMU 8). At the time of the inspection, the tanks were buried and no remediation had begun (see Photograph No. 7). The facility is awaiting state approval for the amended closure and remediation plans. ATC has retained the services of Techna to manage this project.

## 5.0 CONCLUSIONS AND RECOMMENDATIONS

The PA/VSI identified nine SWMUs and two AOCs at the ATC facility. Background information on the facility's location; operations; waste generating processes and waste management practices; history of documented releases; regulatory history; environmental setting; and receptors is presented in Section 2.0. SWMU-specific information, such as the unit's description, dates of operation, wastes managed, release controls, history of documented releases, and observed condition, is presented in Section 3.0. AOCs are discussed in Section 4.0. Following are PRC's conclusions and recommendations for each SWMU and AOC. Table 3, at the end of this section, summarizes the SWMUs and AOCs at the facility and the recommended further actions.

### **SWMU 1                      Hazardous Waste Storage Area**

**Conclusions:**                      This unit began operations in June 1990. The unit is well maintained and has an adequate secondary containment structure. The potential for release to environmental media is summarized below.

Ground Water, Surface Water, On-Site Soils: Low. The construction of the unit and the current waste handling practices limit the potential for a release.

Air: Moderate. The unit has no walls and is used to store highly volatile solvents. Any accidental spill occurring at the unit would result in a release to the air.

**Recommendations:**              PRC recommends no further action for this SWMU at this time.

### **SWMU 2                      Solvents Satellite Accumulation Areas**

**Conclusions:**                      This unit is maintained indoors near the points of waste generation and has been in use since 1983. The drums are maintained indoors on concrete floors that are in good condition. The drums are ultimately stored in the Hazardous Waste Storage Area (SWMU 1). The potential for release to environmental media is low.

**Recommendations:**              PRC recommends no further action for this SWMU at this time.

**SWMU 3****Gaylord Boxes**

**Conclusions:** These boxes are maintained indoors near the points of waste generation and have been in use since mid-1991. The boxes are lined with plastic and transported off site immediately from the storage point. Current waste handling practices also limit the potential for release. The potential for release to environmental media is low.

**Recommendations:** PRC recommends no further action for this SWMU at this time.

**SWMU 4****Nonhazardous Liquid Wastes Storage Areas**

**Conclusions:** These units manage nonhazardous wastes, indoors, on concrete floors that are in good condition. Current waste handling practices also limit the potential for release. The containers for the silicone are reused. The potential for release to environmental media is low.

**Recommendations:** PRC recommends no further action for this SWMU at this time.

**SWMU 5****Oil/Water Satellite Accumulation Area**

**Conclusions:** This unit is maintained indoors near the point of waste generation and has been in use since 1983. The oil and water are separated, the oil is reused at the facility and the water is incinerated off site as solvent-contaminated waste oil (D001). The potential for release to environmental media is low.

**Recommendations:** PRC recommends no further action for this SWMU at this time.

**SWMU 6****Waste Adhesive Satellite Accumulation Area**

**Conclusions:** This unit is a plastic-lined 55-gallon drum which manages wastes indoors, on concrete floors that are in good condition near the points of waste generation. This unit has been in use since 1983. Full drums are ultimately stored in the Hazardous Waste Storage Area (SWMU 1). Current waste handling practices also limit the potential for release. The potential for release to environmental media is low.

Recommendations: PRC recommends no further action for this SWMU at this time.

**SWMU 7                      Paint Waste Satellite Accumulation Areas**

Conclusions: These units are maintained indoors on concrete floors that are in good condition near the points of waste generation and have been in use since 1990. The wastes are identified as paint because they are composed of resins and solvents. The drums are ultimately stored in the Hazardous Waste Storage Area (SWMU 1). Current waste handling practices also limit the potential for release. The potential for release to environmental media is low.

Recommendations: PRC recommends no further action for this SWMU at this time.

**SWMU 8                      Former Hazardous Waste Storage Area**

Conclusions: This former unit was maintained outdoors from 1983 to June 1990. Drums were stored in secondary containment pans. This unit is undergoing closure under RCRA. The current potential for release to environmental media is summarized below.

Ground Water, Surface Water, Air, and On-Site Soils: Low. This unit is no longer active, and no wastes are currently stored at its former location. On-site soil VOC contamination in the area of this unit has been documented, but may be attributable to USTs No. 1 through 3 (AOC 2) located beneath the unit.

Recommendations: PRC recommends that closure activities for this SWMU continue as scheduled.

**SWMU 9                      Isopropanol Satellite Accumulation Area**

Conclusions: This unit is maintained indoors on concrete floors that are in good condition near the point of waste generation and has been in use since 1983. The drums are ultimately stored in the Hazardous Waste Storage Area (SWMU 1). Current waste handling practices also limit the potential for release. The potential for release to environmental media is low.

Recommendations: PRC recommends no further action for this SWMU at this time.

AOC 1 USTs No. 202 and 203

Conclusions: A release of solvents from this AOC to ground water and subsurface soils has been documented. The facility is undergoing remediation activities and has replaced the tanks. The potential of a release to surface water is low because of the distance of this AOC to surface water. The potential of a release to air is moderate to high because, at the time of the inspection, the concrete over the tanks was removed and some of the surface soils had been excavated.

Recommendations: PRC recommends that the extent of ground-water and soil contamination be completely delineated and that the facility proceed with a state-approved remediation plan.

AOC 2 USTs No. 1 through 3

Conclusions: A release of solvents from this AOC to ground water and on-site subsurface soils has been documented. The facility has closed the tanks in-place, filled them with cement, and will perform remediation activities pending state approval. The potential of a release to air or surface water is low because of the closure of this AOC.

Recommendations: PRC recommends that the facility proceed with a state-approved remediation plan. The proposed air stripping of the soils should be monitored closely.

RELEASED 6/18/01  
DATE \_\_\_\_\_  
RIN # \_\_\_\_\_  
INITIALS JTV

ENFORCEMENT  
CONFIDENTIAL

TABLE 3  
SWMU AND AOC SUMMARY

<u>SWMU</u>	<u>Dates of Operation</u>	<u>Evidence of Release</u>	<u>Recommended Further Action</u>
1. Hazardous Waste Storage Area	June 1990 to Present	None	No further action at this time
2. Solvents Satellite Accumulation Areas	1983 to Present	None	No further action at this time
3. Gaylord Boxes	Mid 1991 to Present	None	No further action at this time
4. Nonhazardous Liquid Wastes Storage Areas	1986 to Present	None	No further action at this time
5. Oil/Water Satellite Accumulation Area	1983 to Present	None	No further action at this time
6. Waste Adhesive Satellite Accumulation Area	1983 to Present	None	No further action at this time
7. Paint Waste Satellite Accumulation Areas	1990 to Present	None	No further action at this time
8. Former Hazardous Waste Storage Area	April 1983 to June 1990	None	Continue scheduled closure activities
9. Isopropanol Satellite Accumulation Area	1983 to Present	None	No further action at this time

RELEASED

DATE

RIN #

INITIALS

ENFORCEMENT  
CONFIDENTIAL

TABLE 3 (Continued)  
SWMU AND AOC SUMMARY

<u>AOC</u>	<u>Dates of Operation</u>	<u>Evidence of Release</u>	<u>Recommended Further Action</u>
1. USTs No. 202 and 203	1982 to June 1992	VOC-contaminated subsurface soils and ground water	Completion of state- approved remedial activities; further ground-water and soil contamination investigation
2. USTs No. 1 through 3	Late 1960s to 1990	VOC-contaminated soils; history of spills	Completion of state- approved remedial activities

RELEASED

DATE

RIN #

INITIALS

6/18/01  
MV



## REFERENCES

- American Tape Company (ATC), 1983a. RCRA Part A Permit Application, April 29.
- ATC, 1983b. Martin A. Decker, Plant Engineer, Letter to William H. Miner, EPA, May 18.
- ATC, 1983c. Martin A. Decker, Vice President Engineering, Letter to Michigan Department of Natural Resources (MDNR), Surface Water Quality Division, July 8.
- ATC, 1983d. T. Dodd, Interoffice Correspondence to M. Decker, November 18.
- ATC, 1986. Gary W. VanLuven, Production Manager, Letter to Tim Jaski, MDNR, Surface Water Quality Division, April 4.
- ATC, 1988. Martin A. Decker, Vice President Engineering, Letter to Roy Scharmik, MDNR, Water Quality Division, May 4.
- ATC, 1989a. Martin A. Decker, Vice President Engineering, Letter to James Roberts, MDNR, Waste Management Division, March 23.
- ATC, 1989b. Thomas L. Edie, Process Engineering Manager, Letter to Wayne Disposal, Inc., April 26.
- ATC, 1991. Cynthia I. Frantz, Environmental Coordinator, Letter to Tim Jaski, MDNR, Surface Water Quality Division, April 30.
- Armak Company, 1980. Notification of Hazardous Waste Activity Form, August 18.
- Marysville Chamber of Commerce, 1992. Sharon Downs, Telephone Conversation with Jeff Swano, PRC Environmental Management, Inc. (PRC), August 25.
- Marysville Water Department, 1992. Ashley Grant, Assistant Director, Telephone Conversation with Jeff Swano, PRC, August 21.
- MDNR, 1983. R. Dumitru, Interoffice Communication to T. Dodd, December 5.
- MDNR, 1985. Kenneth L. Damrel, Hazardous Waste Division, Letter to Martin Decker, ATC, October 24.
- MDNR, 1988a. Daria W. Devantier, Environmental Quality Analyst, Letter to Martin Decker, ATC, February 29.
- MDNR, 1988b. Report of Oil, Salt or Polluting Material Losses, April 20.
- MDNR, 1988c. Report of Oil, Salt or Polluting Material Losses, September 27.
- MDNR, 1989a. Daria W. Devantier, Environmental Quality Analyst, Letter to Martin Decker, ATC, March 14.
- MDNR, 1989b. Report of Oil, Salt or Polluting Material Losses, April 18.
- MDNR, 1990a. Donald Mbamah, Environmental Quality Analyst, Letter to Martin Decker, ATC, March 29.

- MDNR, 1990b. Alan J. Howard, Chief Waste Management Division, Letter to Martin A. Decker, ATC, June 15.
- MDNR, 1991a. Donald Mbamah, Environmental Quality Analyst, Waste Management Division, Letter to Cynthia I. Franz, ATC, April 5.
- MDNR, 1991b. Donald Mbamah, Environmental Quality Analyst, Waste Management Division, Letter to Cynthia I. Franz, ATC, September 10.
- PRC, 1992. Jeff Swano, Telephone Conversation with Jordan Thompson, Environmental Coordinator, ATC, August 27.
- St. Clair Water Department, 1992. Tom Galvin, Water Plant Operator, Telephone Conversation with Jeff Swano, PRC, August 25.
- Techna Corporation (Techna), 1988. Hazardous Waste Facility Plans and Specifications for Drum Container Storage, Appendix F, June 23.
- Techna, 1991. Sarah Burton, Project Manager, Letter to Alan J. Howard, Chief, Waste Management Division, MDNR, April 29.
- U.S. Coast Guard, 1989. Letter from F. H. Taylor, Hearing Officer, to Martin A. Decker, ATC, March 23.
- U.S. Department of Commerce (USDC), 1968. Climatic Atlas of the United States.
- USDC, 1989. Local Climatological Data, Annual Summary with Comparative Data, Detroit, Michigan.
- U.S. Environmental Protection Agency, 1983. William H. Miner, Chief, Technical, Permits and Compliance Section, Letter to Chris Kurzweil, General Manager, ATC, May 16.
- U.S. Fish and Wildlife Service, 1989. Revised Section 7 Species/County List for Region 3, March 30.
- U.S. Geological Survey, 1991. Port Huron, Michigan-Ontario, 7.5 Minute Series, Topographic Map.
- Warzyn Engineering, Inc., 1990. Phase II Environmental Assessment, ATC, Marysville, Michigan, April.

**ATTACHMENT A**  
**VISUAL SITE INSPECTION SUMMARY AND PHOTOGRAPHS**

## VISUAL SITE INSPECTION SUMMARY

American Tape Company  
317 Kendall Avenue  
Marysville, Michigan 48040  
MID 061 862 926

Date: March 25, 1992

Primary Facility Representative: Mark Fehlmann  
Representative Telephone No.: (313) 364-9000

Additional Facility Representatives: None

Inspection Team: Jeff Swano, PRC Environmental Management, Inc. (PRC)  
Stan Labunski, PRC

Photographer: Jeff Swano

Weather Conditions: Clear and warm about 65°F, overcast by noon.

Summary of Activities: The visual site inspection (VSI) began at 8:00 a.m. with an introductory meeting. The inspection team explained the purpose of the VSI and the agenda for the visit. Facility representatives then discussed the facility's past and current operations, solid wastes generated, and release history. Facility representatives provided the inspection team with copies of requested documents.

The VSI tour began at 11:45 a.m. The tour began outdoors at the Hazardous Waste Storage Area (SWMU 1) and proceeded to the Underground Storage Tanks (UST) No. 202 and 203 (AOC 1) and No. 201. The inspection team went into a warehouse and observed the Nonhazardous Liquid Wastes Storage Area (SWMU 4). A tour of the production facilities followed this and the team observed the Oil/Water Satellite Accumulation Area (SWMU 5), Solvents Satellite Accumulation Area (SWMU 2), Paint Waste Satellite Accumulation Areas (SWMU 7), Gaylord Boxes (SWMU 3), and Waste Adhesive Satellite Accumulation Area (SWMU 6). The tour went outdoors and the inspection team observed the Former Hazardous Waste Storage Area (SWMU 8), and USTs No. 1 through 3 (AOC 2).

The tour concluded at 1:30 p.m., after which the inspection team held an exit meeting with facility representatives. The VSI was completed and the inspection team left the facility at 1:50 p.m.



Photograph No. 1

Orientation: North

Location: SWMU 1

Date: 03/25/92

Description: Hazardous Waste Storage Area. Floor is raised in the foreground and curbed in the back. Some drums are being stored and are wrapped in plastic.



Photograph No. 2

Orientation: South

Location: SWMU 2 and 5

Date: 03/25/92

Description: Solvents Satellite Accumulation Area (SWMU 2) is on the left. The Oil/Water Satellite Accumulation Area (SWMU 5) is on the right. Drums to the far left contain product. Water is drained out the bottom spigot of oil/water drum.



Photograph No. 3

Orientation: West

Location: SWMU 3

Date: 03/25/92

Description: A typical Gaylord Box. The container is lined with plastic. Fire extinguishers are located nearby.



Photograph No. 4

Orientation: East

Location: SWMU 4

Date: 03/25/92

Description: Silicone is stored in these boxed bulk tanks. These containers are emptied through spigots located at their bottoms. Box at top right is almost full. All containers are marked "Nonhazardous Waste."





Photograph No. 5

Orientation: East

Description: Waste water-soluble oil is stored in the drums. These drums are located next to boxes in photograph number 4.

Location: SWMU 4

Date: 03/25/92

Photograph No. 6

Location: SWMU 6

Orientation: North

Date: 03/25/92

Description: Waste Adhesive Satellite Accumulation Area. The drum is lined with plastic. The filter sock hangs in the drum while the adhesive drains out of it.





Photograph No. 7

Orientation: North

Location: SWMU 8 and AOC 2

Date: 03/25/92

Description: The Former Hazardous Waste Storage Area (SWMU 8) used to be located here.  
The leaking USTs No. 1 through 3 (AOC 2) are located under the foreground.



Photograph No. 8

Location: AOC 1

Orientation: North

Date: 03/25/92

Description: Leaking USTs No. 202 and  
203 (AOC 1). Remediation is  
currently going on.



Photograph No. 9

Location: New USTs location

Orientation: North

Date: 03/25/92

Description: Fuel Oil UST No. 201. This tank is no longer at the facility and new USTs for solvents have been installed here.



**ATTACHMENT B**  
**VISUAL SITE INSPECTION FIELD NOTES**

(48) Wednesday March 25<sup>25</sup>, 1992  
American Tape Co. PA/USI  
Time Arrive: 0750  
Time Leave: 1350

Weather Conditions: Clear + warm. Overcast by noon.

Interview Start Time: 0800

Interview End Time: 1115.

Persons Present

Stan Labunski

Jeff Swano

Mark Fehlmann

Affiliation

PRC

PRC

Am. Tape Engineering Mfg.

Swano 3/25/92

(49) Interview discussion:

Environmental Coordinator position created in Sept. 1990.

Stan introduces the PA/USI program, describes the process of the inspection.

Cindy Frantz was the Env. Coordinator prior to our inspection (982-7271 is her number if we have questions). She left & the new Coordinator

will begin 3/30/92

they have another site in

New Jersey that uses all

water-based processes.

Here it is a solvent-based

Swano 3/25/92

(50)

operation. Toluene is the <sup>tape</sup> solvent; it has been used since Dow built the facility in the 1940s as a defense industry munitions.

1949: The property was divided up and sold.

1962 moved to this location from Port Huron.

Processes  $\Rightarrow$  Bandwags are major mixers, hot & break down the rubber in a batch mixer.

Next, goes to a nitrogen mixer, then churn it. 550 gallon totes are filled & stored. Whip room, when ready, add a catalyst to resinure.

Swans 3/25/92

(51)

rubber in tote, mixes it. If the batch is ruined it becomes a haz waste & is drummed. It is ruined because too much time goes by (> 6 hrs) & it solidifies.

After whipping  $\Rightarrow$  Goes to coating lines. Line #3 is reinforced tapes; #1 & #4 are masking lines.

(They are competing w/ 3M; tape market is \$3.6 billion annual. m.)  
Dried in ovens, ~9 ovens with NPDES permits.  $\$3.5$  3/25/92  
Roll it up and either sell to someone or go to slitting.

Swans 3/25/92

(52)

Slitting  $\Rightarrow$  cuts length + width. Then wrap + box,  $\rightarrow$  PVC shrink-wrap. Converting to polyethylene in the future.

Prior to wrapping a "Dusong process". A polyethylene "dust" is applied to the sides of the tape rolls. Electrostatically applied.

The dust is recycled until it can't be reused then it is solid waste + dumped + land filled. St Clair County land fill (Alec Smith Creek) RDS hauls the wastes. Fort Gratiot land fill is

J. Evans 8/25/92

(53)

a potential Superfund site because of alleged midnight dumping.

Incinerators  $\Rightarrow$  Ross Env. Services in Grafton, Ohio receives several waste streams (see handout) + Laidlaw Environmental in Sarnia, Ontario, Canada.

Line B is gas-fired; the others are electric.

Trenches do exist around equipment but they have been had their drains plugged.

Paints come in 55 gallon drums + sometimes they have residuals.

J. Evans 3/25/92

(54)

Gaylord boxes  $\Rightarrow$  2 SAAs  
Overdrippings  $\Rightarrow$  Extreme heat  
liberates oils & resins which  
are collected & drummed.

Waste Oil  $\Rightarrow$  equipment generators.  
Goes to Safety Klean

Water soluble oil  $\Rightarrow$  goes to landfill

Drum Storage new area <sup>operational</sup> ~~starts 3/25/92~~  
June, 1991.

40 yard open top emptied 2 times  
a year.

#3 LUSTs  $\Rightarrow$  will be replaced by  
end of April, 2 Toluene tanks.

Techna Corp is managing the  
cleanup. Put in in 1982

Swano 3/25/92

(55)

20,000 gallons each. Some  
contaminated soil went  
to Wayne Disposal & Class  
I landfill in Wayne County.

Leach Compactor, 24-yard  
Compactor, collected by RDS.  
Paper, polyethylene film  
Hauled 1 per wk.

#5 LUSTs  $\Rightarrow$  6 tanks, 5 leaking.  
history of spills & contain.

Soils. All tanks closed in  
place <sup>July</sup> 1990, & 3 in July 1991.  
12,000 gallons each.

Contained rubber solvent, Toluene,  
Tol-Rubber blend, Mineral oil,  
Techna Corp is managing the  
closure process & cleanup.

In situ air stripping.  
Installed 1966 & 1969.

Swano 3/25/92

(50)

pump &amp; treat.

3 tanks clean-closed<sup>in place</sup> in Dec 1989 at the east side of the whip room. Contained 1 methanol, 2 isopropyl alcohol, 2,000 gallons, 8,000 gal, 3,000 gallons Insulated 1964.

#6 Sorage Pad installed in 1983 closed in 1980.

#14 1982 fuel oil tanks 30,000 gallon. Will be pulled. The tanks from #3 will be replaced by tanks placed in this area. Never leak-tested but will be closed. Was filled but never used.  
Guano 3/25/92

(51)

Photographer: J. Swano  
Nikon Camera

#	Time	Dir.	Subject
1	1145	W	Recycle Matl area
2	1150	N	Leach Compactor
3	1154	N	HW Store area
4	1201	N	USTs for bleed & piping
5	1202	N	Fuel oil tank & piping area
6	1205	NE	Dumpster #2
7	1210	E	Non haz log waste landman collected
8	1210	E	Storage area
9	1225	N	Compactor
10	1226	S	Recycle area
11	1228	NE	Dumpsters
12	1235	S	SA
13	1245	W	Gaylord box
14	1255	N	Former hazardous waste storage on Bldg. foreground
15	↓	↓	13 USTS 20/15/10/5 SSA 4/11/92 SSA Dump site
16	1305	N	
	1315	N	Guano 3/25/92

(58)

#7 Secondary compactor  $\Rightarrow$   
gets all other waste not  
associated with coating waste,  
hauled by RDS 1 or 2 times  
a week.

#8 40-yd open top.  $\Rightarrow$  Items that  
can't go in to compactors.  
Start-up "tape wound up"  
in cardboard drum" <sup>RDS, 1 per 2 wks</sup>

#9 30-yard open top. 3 times a yr  
RDS hauls away. In here  
are crushed steel drums.

#10 Recycled material  $\Rightarrow$  cardboard,  
computer paper & white paper.  
Collected throughout facility  
A. Howard hauls for free,  
1 per 2 months. Cardboard  
is bailed at #11.

Sutton 3/25/92

(59)

#13 Placed in cardboard drums,  
sealed & placed in #7 or  
#8. Goes to RDS hauls.

Outside of wet mix area a condenser  
vent drips water outside. Dec.  
1991 sampling identified toluene  
in the water. Will soon add  
a filter process; well, this  
area outside is asphalted  
but they will test soils.

Drums in storage area are  
checked daily.

11.2 acres; looking to acquire  
additional 1.7 acres at the  
south end of facility.

Sutton 3/25/92



(68)

Raw materials are brought in by tanker trucks once a week, totalling 25,000 gallons per month. Recovered 2 million gallons in last FY. 484,000 gallons purchased last FY, ~ 8,000 gals/wk. Mostly all raw materials are delivered by truck. Solvent recovery goes through fixed-bed carbon absorption. 4 beds. In 1988 removed all the carbon from #2 + #4 filters. Went to a Pensy/union firm for reactivation. Installed in 1989. Then #1 + #3 were

3/25/92

(69)

<sup>in 1989</sup> taken away, but NOT regenerated, but instead AmTape bought virgin material replaced in 1984. Installed in 1982 these filters. Envirotrol, Inc of Sewickley, PA. Roughly 45,000 lbs per absorber. Production water comes from city, city uses St. Clair River water. Located in an industrial park. 340 employees, 7 days/wk, 3 shifts/day. Slitting runs 5 days/wk. Their spills are handled in a particular way → initiate a form + call appropriate authorities. One spill

3/25/92

(62)

in 1988 managed to reach  
The river via the storm sewers  
& find 600. Great Lakes  
Environmental did the clean  
up in Warren, MI.  
Wayne disposal received the  
soil. Also Marine Pollution  
Control of Detroit cleaned  
up 600 gallons from SW.

655-  
gallon  
drums

Ross is in Grafton, Ohio; Ross  
Incineration Services

Laidlaw is in Corunna, Ontario,  
Canada

Techna Corp is of Plymouth, MI  
Certified Abatement removed  
Asbestos from the facility.

Dwight 3/25/92

(63)

Beg. tour 1/4/5

HW storage area  $\Rightarrow$  Concrete,  
Surrounded by 6' fence, no  
Barbed wire 6'  $\frac{1}{2}$ " from  
(concrete) at north end,  
Sloping up  $\sim$  6'  $\frac{1}{2}$ " at south  
end. Covered. 10 drums  
stored, covered with  
plastic (surrounded, wrapped  
in plastic). Looks real good  
~~Drum~~ <sup>333333</sup> in Northern corner is  
a sump.

Air filters have been disposed by  
RDS.

Dumpster "2" per map full of  
concrete pallets assorted trash

Dwight 3/25/92

(64)

1205

Summary (map #15) of  
Cardlaw waste. Storing  
silicone, water-based scrap.  
Cardlaw sucks it out  
from spools located at  
bottom of boxes. All  
non hazardous liquid  
wastes. 30 x 15  
19 boxes 23 drums  
All stored on pallets.  
Drums contain waste  
white solution, 3 are  
empty. 1 contains silicone

Scrap.

1220

Drum Zero' dumpster is 15 feet  
North of flattened steel drums  
+ 30 feet South of compactor <sup>October 1991</sup>  
on S side of building. Outdoors

Frederick 3/25/92

(65)

1225 Recycling area is 30  
feet long by 12 feet deep

Contains baled cardboard &  
empty <sup>3/25/92</sup> raw material  
drums Some are cleaned.

65 drums total, stacked  
on pallets. In concrete  
caving #16 the satellite  
accumulation area for  
waste water mixed w/ oil.

The oil <sup>3/25/92</sup> water is  
skipped off the bottom &  
drummed; oil reused.

Gaylord box containing  
waste socks <sup>cloth</sup> → Filter  
Bags of resin are also  
accumulated here.

1243

Frederick 3/25/92

(106)

1245 Enter Whop room

On the floor are squares that indicate tanks closed in-place in 1989. Socks Screen particulates out of the adhesive

1246 SAA of spent adhesive (1 drum) & waste paint (1 drum)

1250 Find a drum w/ haz waste sticker on it. Mark doesn't know why. There are 4 drums. 3 have product. The waste one is waste and is a satellite drum for the

Parsons 3/25/92

(68)

coating lines. They will fill out the sticker more when the drum is full.

(Batch is called XA516)

This info supplied by

John La Croix Supervisor.

1255 former haz waste storage

area by the 3 L45TS

closed in place.

1300 Line 1 + Line 4

1305 Satellite accumulation area

of Silicone waste

1310 Walk through cutting area

1315 Near boiler. Find Satellite

dumpster for scrap materials:

ape etc

1335 finish up.

Parsons 3/25/92

69

This page  
NOT  
used

3/25/92

Square

68

Photo Log Cont'd

#	Time	Dir	Subject
17	1317	S	Bailer
18	1320	N	SAA dumpsite w/ scrap rope
19	1320	SE	SAA dumpsite cardboard collecting "diso"
20	1325	E	area

The 1988 sp. 11 occurred by the  
#6 area.

Square 3/25/92

NATURAL RESOURCES  
COMMISSION

LARRY DEVUYST  
PAUL EISELE  
GORDON E. GUYER  
JAMES P. HILL  
DAVID HOLLI  
O. STEWART MYERS  
JOEY M. SPANO

STATE OF MICHIGAN



JOHN ENGLER, Governor

DEPARTMENT OF NATURAL RESOURCES

Stevens T. Mason Building, P.O. Box 30028, Lansing, MI 48909

ROLAND HARMES, Director

12/4/92  
RECEIVED  
WMD RCRA  
RECORD CENTER

October 19, 1992

Ms. Laura Lodisio, HRE-8J  
U.S. Environmental Protection Agency  
77 West Jackson Boulevard  
Chicago, Illinois 60604-3590

Dear Ms. Lodisio:

SUBJECT: Comments on Draft PA/VSI  
American Tape Company  
Marysville, Michigan  
MID 061 862 926

Thank you for the opportunity to review the draft PA/VSI for the subject facility. At this time we have no comments. Based on our information, we concur with the recommendations presented in the Executive Summary. In addition, we concur that the facility is an interim status storage facility, and that closure of the container storage unit has not yet been completed.

It should be noted that closure of the former hazardous waste storage area is going to be conducted along with remediation of the leaking underground storage tanks. Representatives of the Waste Management Division and the Environmental Response Division have met with the company to discuss the project, because the company was unable to discern whether the contamination detected is from the underground storage tanks or the hazardous waste storage area. The company is expected to submit a workplan to both divisions that will identify which activities will address appropriate closure requirements. Since proposed remediation is expected to include in-situ remediation for the underground storage tanks area, the Environmental Response Division has agreed to take the lead on this project.

This review is intended to identify major deficiencies in the draft PA/VSI. This review does not represent an exhaustive file search or technical analysis, and does not verify the accuracy of information presented in the draft PA/VSI.

Ms. Laura Lodisio

-2-

October 19, 1992

Please contact me at Waste Management Division, Michigan Department of Natural Resources, P.O. Box 30241, Lansing, Michigan 48909, or at the telephone number listed below if you have any questions.

Sincerely,



Kenneth J. Burda, Chief  
Hazardous Waste Permits Section  
Waste Management Division  
517-373-0530

cc: Corrective Action File





UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 5

77 WEST JACKSON BOULEVARD

CHICAGO, IL 60604-3590

REPLY TO THE ATTENTION OF:

HRE-8J

March 11, 1992

Mr. Mark Fehlmann  
Environmental Manager  
American Tape Company  
317 Kendall Avenue  
Marysville, MI 48040

Re: Visual Site Inspection  
American Tape Company  
MID 061 826 926

862

Dear Mr. Fehlmann:

The United States Environmental Protection Agency (U.S. EPA) Region V will conduct a Preliminary Assessment including a Visual Site Inspection (PA/VSI) at the referenced facility. This inspection is conducted pursuant to the Resource Conservation and Recovery Act, as amended (RCRA) Section 3007 and the Comprehensive Environmental Response, Compensation, and Liability Act, as amended (CERCLA) Section 104(e). The referenced facility has generated, treated, stored, or disposed of hazardous waste subject to RCRA. The PA/VSI requires identification and systematic review of all solid waste streams at the facility. The objective of the PA/VSI is to determine whether or not releases of hazardous wastes or hazardous constituents have occurred or are occurring at the facility which may require further investigation. This analysis will also provide information to establish priorities for addressing any confirmed releases.

The visual site inspection of your facility is to verify the location of all solid waste management units (SWMUs) and areas of concern (AOCs) to make a cursory determination of their condition by visual observation. The definitions of SWMUs and AOCs are included in Attachment I. The VSI supplements and updates data gathered during a preliminary file review. During this site inspection, no samples will be taken. A sampling visit to ascertain if releases of hazardous waste or constituents have occurred may be required at a later date.

Assistance of some of your personnel may be required in reviewing solid waste flow(s) or previous disposal practices. The site inspection is to provide a technical understanding of the present and past waste flows and handling, treatment, storage, and disposal practices. Photographs of the facility are necessary to document the condition of the units at the facility and the waste management practices used.

The VSI has been scheduled through Cam Slicker of your office for March 25, 1992 at 8:00 a.m. The inspection team will consist of Jeff Swano and Stan Labunski of PRC Environmental Management, Inc., a contractor for the U.S. EPA. Representatives of the Michigan Department



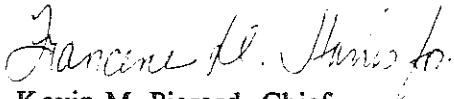
March 11, 1992  
Page 2

of Natural Resources may also be present. Your cooperation in admitting and assisting them while on site is appreciated.

The U.S. EPA recommends that personnel who are familiar with present and past manufacturing and waste management activities be available during the VSI. Access to any relevant maps, diagrams, hydrogeologic reports, environmental assessment reports, sampling data sheets, environmental permits (air, NPDES), manifests and/or correspondence is also necessary, as such information is needed to complete the PA/VSI.

If you have any questions, please contact me at (312) 886-4448 or Francene Harris at (312) 886-2884. A copy of the Preliminary Assessment/Visual Site Inspection Report, excluding the conclusions and Executive Summary portion will be sent when the report is available.

Sincerely yours,



Kevin M. Pierard, Chief  
OH/MN Technical Enforcement Section

Enclosure

cc: Ken Burda, MDNR - Lansing  
Dennis Drake, MDNR - Lansing  
Ben Okwumabua, MDNR

## ATTACHMENT I

The definitions of solid waste management unit (SWMU) and area of concern (AOC) are as follows.

A SWMU is defined as any discernable unit where solid wastes have been placed at any time from which hazardous constituents might migrate, regardless of whether the unit was intended for the management of a solid or hazardous waste.

The SWMU definition includes the following:

- RCRA regulated units, such as container storage areas, tanks, surface impoundments, waste piles, land treatment units, landfills, incinerators, and underground injection wells
- Closed and abandoned units
- Recycling units, wastewater treatment units, and other units that U.S. Environmental Protection Agency has generally exempted from standards applicable to hazardous waste management units
- Areas contaminated by routine and systematic releases of wastes or hazardous constituents, such as wood preservative treatment dripping areas, loading or unloading areas, or solvent washing areas

An AOC is defined as any area where a release to the environment of hazardous wastes or constituents has occurred or is suspected to have occurred on a nonroutine or nonsystematic basis. This includes any area where such a release in the future is judged to be a strong possibility.

PRC requests that, if available, the following facility information be provided during the VSI:

1. Two copies of a detailed map of the facility
2. Facility history, including dates of operation, ownership changes, and production processes
3. Current facility operations
4. Processes that generate waste that is treated, stored, or disposed of at the facility
5. Records of disposal of wastes generated at the facility (manifests, annual reports, etc...)
6. Security at the facility
7. Information regarding geology and the uses of ground water and surface water in the area
8. Permits (air, NPDES, etc...) the facility currently holds or has held in the past and documentation of any permit violations that may have occurred
9. Records of any spills that may have occurred at the facility
10. Descriptive operational information (location, dimensions, capacity, materials of construction, etc...), dates of start-up and closure, wastes managed, release controls, and release history for each SWMU

PRELIMINARY REVIEW

PREPARED BY

STEVE TUMBARELLO  
UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION V  
230 SOUTH DEARBORN STREET  
CHICAGO, ILLINOIS 60604

FACILITY PREPARED FOR

AMERICAN TAPE COMPANY  
317 KENDALL AVENUE  
MARYSVILLE, MICHIGAN 48040  
MID 061 862 926

A. PURPOSE

The purpose of the Preliminary Review (PR) is twofold: to gather and evaluate existing information on facilities, in order to identify and characterize potential releases, and; to focus the activities to be conducted in the second and third steps of the RFA, the visual site inspection (VSI), and the sampling visit (SV).

B. SCOPE

The scope, or area covered by a PR, is to identify areas at a facility which may be releasing hazardous wastes or hazardous constituents that may be harmful to human health and the environment. This involves investigating release potential to all environmental media at the facility (with the exception of ground-water releases from regulated units which is addressed by RCRA and regulated by MDNR), including: ground-water, surface water, air, soils, and subsurface gas.

C. FACILITY DESCRIPTION

American Tape, formerly both Armak Co., and then Akzo Manufacturing Co., is located in Marysville, MI, and manufactures pressure sensitive adhesive tapes. The facility is located only about one mile from the St. Clair River, which flows south into Lake St. Clair. The company is filed with the U.S. EPA as both a generator and storer of hazardous waste under facility number MID061862929. The only hazardous waste stored on site is isopropanol alcohol (IPA), a flammable liquid with a UN/NA number of UN-1219. *HW. Code 6*

*Regulated*  
The hazardous waste storage area is a non-covered rectangle measuring 30 feet long by 25 ft. wide (750 ft<sup>2</sup>). The area is located on 6 in. concrete pad area. It is secured by an 8 ft. high fence with a locked gate located in the northwest corner of an enclosed courtyard. The courtyard is completely enclosed by buildings with brick walls, on the north and south, and by buildings with concrete walls, on the east and west.

The waste itself is stored in polyethylene lined 55 gallon drums. Approximately every 6 months a licensed transporter, Tricil Limited MIT270019904, hauls the waste to an incinerator to be burned.

D. FACILITY MANUFACTURING PROCESSES AND DESCRIPTIONS

American Tape's manufacturing process for pressure sensitive tapes involves the following steps: adhesive dry mixing, adhesive wet mixing, coating, and slitting. In the dry mix area, natural and/or synthetic rubber, zinc oxide, and various conditioners are mixed (with temperature and time controlled) and then dropped to a roll mill for derating and sheeting. The rubber stock then moves to the wet mix area where it is mixed with resins and, finally, dissolved in rubber solvent. Three blade mixers and one 1200-gallon churn are used in the wet mix area. In the coating area, saturated and released coated paper is coated with

adhesive base coat and top coat. After each coat is applied, the solvent is evaporated in either an infrared or conventional oven at a temperature between 170 and 270°F. The solvent laden air is collected and recycled back into the adhesive. After the top coat dries, the adhesive is further cured at 295-305°C in an oven. Finally, the coated rolls are moved to the slitting area for cutting and packaging.

The manufacturing produces a by-product of 99% isopropyl alcohol (IPA), and 1% water and Du Ponts Quilon. The IPA is, of course, a hazardous material and is stored in the manner described in Part C.

The facility is engaged in an extensive recycling program and their objective is to completely omit IPA generation by 1992.

#### E. WASTE CHARACTERISTICS

As previously mentioned, the only hazardous waste generated at American Tape is isopropanol alcohol. The actual concentrations of solvents are 99% IPA and 1% water and Quilon, neither of which are listed EPA hazardous wastes.

The waste is collected in 55 gallon drums and stored in the designated area, after being properly covered, labeled and numbered. After about 1000 gallons of waste is accumulated the waste is shipped to Tricil, LTD., where it is incinerated as a quasi-fuel.

Under RCRA and Act 64 IPA waste is characterized as hazardous because it is ignitable (flash pt. below 140°F).

#### F. GEOLOGICAL CONDITIONS/HYDROGEOLOGICAL

The regional geology of Eastern Michigan is summarized in a stratigraphic column (Figure 2)

In addition, see Figure 1 for a detailed topographical map of the area surrounding American Tape.

According to Jim Roberts of MDNR, American Tape has not submitted any geological/hydrogeological reports as of January 1, 1989, even though they are required.

#### G. RECEPTOR INFORMATION

American Tape is located in Marysville, Michigan. The facility can be found on the Port Huron Quadruple topographical map. It is located 42° 52'410" N latitude and 82°28'570" W longitude. The site is located about 1200 feet west of the St. Clair River. American is located on Township 5NR 17E Section 7 1/4.

The facility is located only about one mile west of Canada, which is on the east bank of the St. Clare River. Immediately north of the facility are sand dunes, and then a golf course; west of the facility runs the

Port Huron and Detroit Railroad line and further to the west is a marsh. South of the site is largely undeveloped as is the property east of the facility, until, of course, one runs into the facility. Only about 1000 ft. north-by-northeast of the facility is a trailer park.

*✓*  
A trailer park is located  
1000 ft. north of the  
facility.

#### H. FILE REVIEW

American Tape, under its former name of Armak (Akzo Chemie American) filed a Part A application on May 5, 1983. On this application they claim to only have a container storage area, capable of storing, at most, 12,000 gallons of hazardous wastes.

*WASTE CODE //*

#### I. COMPLIANCE HISTORY

March 6, 1981; Inspection by MDNR. Major finding of the inspection were: the facility had not analyzed waste, their personnel training records were incomplete, and their contingency plan did not mention any arrangements with local authorities.

September 7, 1982; Inspection by MDNR with the major finding being that no operating record was available as required, per 40 CFR 265.73.

September 4, 1984; Inspection by Larry AuBuchon of the MDNR (Hazardous Waste Division). The major findings were: the annual training was not preformed as required in 40 CFR 265.16, no smoking signs should be placed on the storage area fence as required in 40 CFR 265.17, some containers were not in good condition as required in 40 CFR 265.171, hazardous waste labels should be placed on the waste drums in storage, and it was strongly recommended that a containment area be built around the storage area. ✓

October 22, 1985; Inspection conducted by Mr. Kenneth Damrel, an Environmental Engineer with MDNR; it was determined that the facility has no deficiencies of the requirements of RCRA in the areas reviewed during the inspection.

October 30, 1986; Letter of warning from MDNR to American Tape detailing apparent violations of the Michigan Hazardous Waste Management Act, 1979 PA 64, Part 7 (the MDNR equivalent of 40 CFR Part 265, Subpart H) for the following reasons: failure to provide adequate financial assurance coverage for closure/post-closure costs (i.e., trust agreement, security bond, letter of credit, certificate of insurance, financial test, etc., and, failure to provide adequate coverage for sudden accidental occurrences (i.e., liability insurance and/or financial test).

April 22, 1987; American Tape included a copy of performance bond assuring coverage for closure and post-closure cost for the files. Also, American mailed a copy of invoice, which has been paid for present period. ✓

J. SOLID WASTE MANAGEMENT UNITS

On their certification regarding potential releases from solid waste management units the facility indicated that it had no SWMUs. No contradictory evidence was found to dispute this, and this will be verified during the VSI.

- Release  
- Information No.

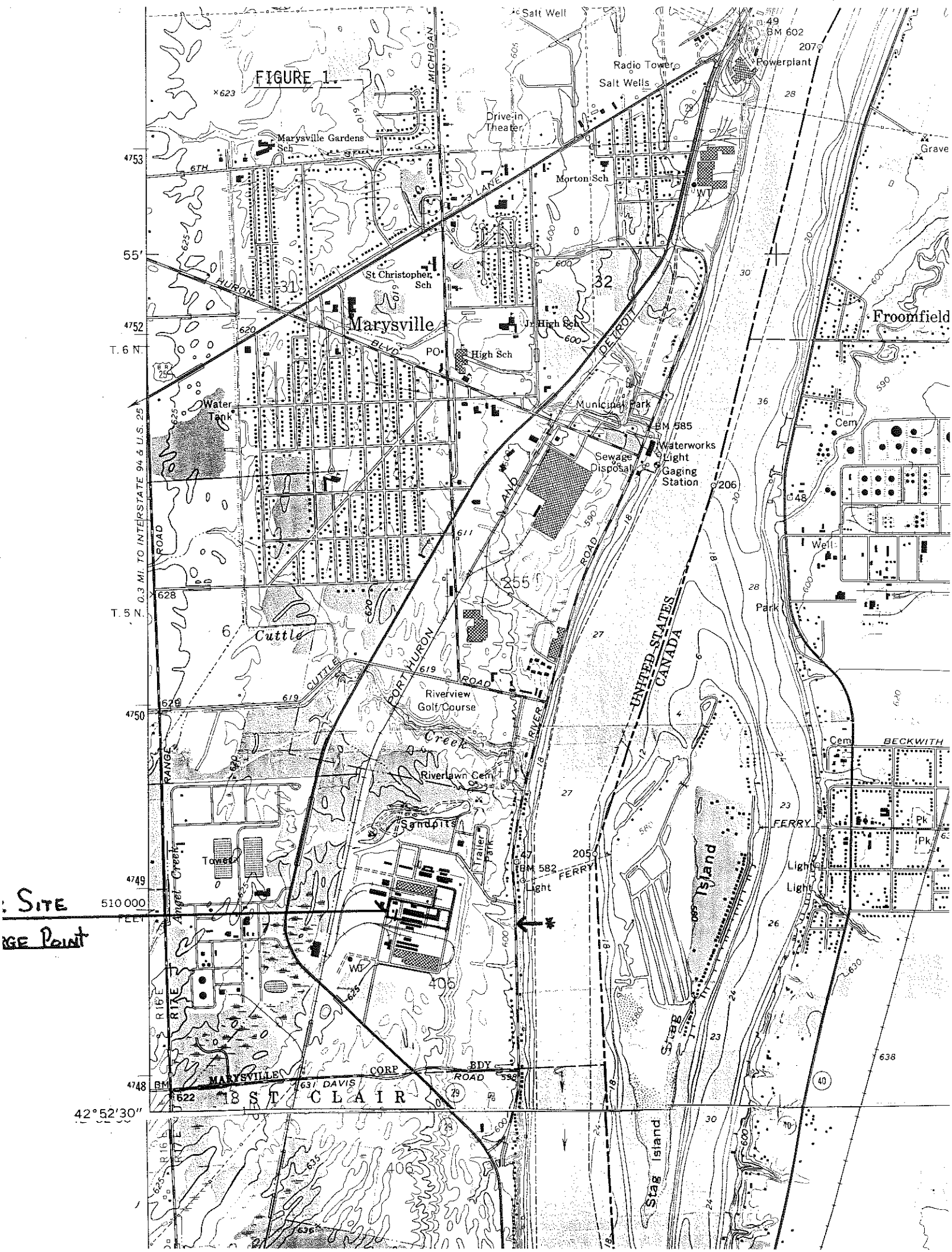




FIGURE 2.

-10-

COLUMN C - ROCKS CROPPING OUT IN CENTRAL LOWER PENINSULA, OR FOUND IN THE SUBSURFACE BY DRILLING				APPROX. MAX. SUBSURFACE THICKNESS IN FEET
ROCK GROUPS	ROCK FORMATIONS	FORMATION MEMBERS	SOME INFORMAL TERMS USED IN SUBSURFACE PETROLEUM WORK	
	GLACIAL DRIFT, LATE PLEISTOCENE			
	"RED BEDS", UNNAMED, ?LATE JURASSIC?			220
	GRAND RIVER FORMATION	IONIA, EATON, AND WOODVILLE SANDSTONES		750
	SAGINAW FORMATION	VERNE LIMESTONE	PARMA SANDSTONE	
	BAYPORT LIMESTONE			160
GRAND RAPIDS	MICHIGAN		"TRIPLE GYP" BROWN LIME STRAY-STRAY SANDSTONE-GAS STRAY DOLOMITE	600
	MARSHALL FORMATION	NAPOLEON SANDSTONE LOWER MARSHALL SS.	STRAY SANDSTONE-GAS, OIL MARSHALL SANDSTONE GAS, OIL	330
	COLDWATER SHALE (WEST)	"MARSHALL" SANDSTONE (EAST)	COLDWATER LIME WEIR SAND - GAS COLDWATER RED - ROCK	1300
	ELLSWORTH SHALE (W. MICH.)		BEREA (W. MICH.) - OIL, GAS BEREA SAND (E. MICH.) - OIL, GAS	1320
	ANTRIM SHALE (E. MICH.)			
TRAVERSE (GENERALLY UNDIVIDED IN SUBSURFACE)	SQUAW BAY LIMESTONE		SQUAW BAY - OIL, GAS	830
			TRAVERSE FORMATION TRAVERSE LIME - OIL, GAS STONEY LAKE ZONE - OIL, GAS (UPPER TRAVERSE IN W. MICH.)	
	ALPENA LS.			
	BELL SHALE			
	ROGERS CITY LS.		ROGERS CITY LS. - OIL, GAS	475
	DUNDEE LIMESTONE		DUNDEE LIMESTONE - OIL, GAS	
DETROIT RIVER	LUCAS FORMATION		REED CITY ZONE - OIL, GAS SOUR ZONE - OIL, GAS RICHFIELD ZONE - OIL, GAS	1450
	AMHERSTBURG FM.			800
	BOIS BLANC FORM.			100
	GARDEN ISLAND FM.			
BASS ISLANDS				700
SALINA	G UNIT		E-ZONE (OR KINTIGH ZONE) - OIL	3150
	F EVAPORITES			
	E UNIT			
	D EVAPORITE			
	C UNIT		A-2 DOLOMITE - GAS A-2 LIME - GAS A-1 DOLOMITE - OIL, GAS	
	B EVAPORITE			
	A-2 CARBONATE			
	A-2 EVAPORITE			
A-1 CARBONATE				
A-1 EVAPORITE				
NIAGARA			NIAGARA - OIL, GAS GRAY NIAGARA - OIL, GAS WHITE NIAGARA	980
			ROCKY HILL SHALE (E. MICH.)	
CATARACT	CABOT HEAD SH.			200?
	MANITOULIN DOL.			
RICHMOND	QUEENSTON SHALE			950
EDEN	UTICA SHALE	COLLINGWOOD SHALE	TRENTON GROUP - OIL, GAS BLACK RIVER FM. - OIL, GAS BLACK RIVER SH. - OIL, GAS VAN WERT ZONE - OIL, GAS	1100
TRENTON - BLACK RIVER (UNDIVIDED)		GLENWOOD		
	ST. PETER SS.			260
	SHAKOPEE DOL.			
PRARIE DU CHIEN	NEW RICHMOND SS.		ONEOTA DOLOMITE - OIL	425
	ONEOTA DOLOMITE			
LAKE SUPERIOR	TREMPEALEAU FORMATION	JORDAN SANDSTONE LODI DOLOMITE ST. LAWRENCE DOLOMITE		750
	FRANCONIA SS.			
	DRESSBACH SS.			1175?
	EAU CLAIRE FM.			
	MOUNT SIMON SS.			
	JACOBSVILLE SS.			1100+
PRE-CAMBRIAN - IGNEOUS, METAMORPHIC, SEDIMENTARY ROCKS				TOTAL 13,125 (NOT ALL BENEATH ANY ONE POINT)
EVAPORITE (HALITE, GYPSUM, OR ANHYDRITE)				MAJOR EROSIONAL GAP IN RECORD. ROCKS OF THESE AGES MISSING HERE; MAY BE PRESENT ELSEWHERE. UNCONFORMITY.
COAL				
CARBONATE REEFS OR BIOHERMS OF ORGANIC ORIGIN				EROSIONAL GAP IN ROCK RECORD. UNCONFORMITY.

*labeled as Akzo Chemie*



January 22, 1986

RCRA Activities  
Region V  
P.O. Box A3587  
Attention: ATKJG  
Chicago, Illinois 60690

Attn: Mr. David A. Stringham  
Chief, Solid Waste Branch

RE: American Tape Co.  
MID 061862926  
Hazardous Waste Permit Application

Dear Mr. Stringham:

Please find enclosed certification regarding potential releases from solid waste management units. A name change from Armak (Akzo Chemie American) to American Tape Co. was requested and granted after tape division was sold April 1983.

I have also enclosed a copy of Site Inspection Report dated October 24, 1985. If you have any additional questions, please contact me at 313-364-9000.

Sincerely,



Martin Decker  
Vice President  
Engineering

MAD/dja

Enclosed:  
Certification  
1985 Inspection Report

Sent as registered mail.

CERTIFICATION REGARDING POTENTIAL RELEASES FROM  
SOLID WASTE MANAGEMENT UNITS

FACILITY NAME: American Tape Co.  
EPA I.D. NUMBER: MID 061862926  
LOCATION CITY: 317 Kendall Ave., Marysville  
STATE: Michigan 48040

1. Are there any of the following solid waste management units (existing or closed) at your facility? NOTE - DO NOT INCLUDE HAZARDOUS WASTE UNITS CURRENTLY SHOWN IN YOUR PART A APPLICATION

	YES	NO
◦ Landfill	<u>      </u>	<u>X</u>
◦ Surface Impoundment	<u>      </u>	<u>X</u>
◦ Land Farm	<u>      </u>	<u>X</u>
◦ Waste Pile	<u>      </u>	<u>X</u>
◦ Incinerator	<u>      </u>	<u>X</u>
◦ Storage Tank (Above Ground)	<u>      </u>	<u>X</u>
◦ Storage Tank (Underground)	<u>      </u>	<u>X</u>
◦ Container Storage Area	<u>      </u>	<u>X*</u>
◦ Injection Wells	<u>      </u>	<u>X</u>
◦ Wastewater Treatment Units	<u>      </u>	<u>X</u>
◦ Transfer Stations	<u>      </u>	<u>X</u>
◦ Waste Recycling Operations	<u>      </u>	<u>X</u>
◦ Waste Treatment, Detoxification	<u>      </u>	<u>X</u>
◦ Other <u>                                </u>	<u>      </u>	<u>      </u>

\* Currently shown in our part A application.

2. If there are "Yes" answers to any of the items in Number 1 above, please provide a description of the wastes that were stored, treated or disposed of in each unit. In particular, please focus on whether or not the wastes would be considered as hazardous wastes or hazardous constituents under RCRA. Also include any available data on quantities or volume of wastes disposed of and the dates of disposal. Please also provide a description of each unit and include capacity, dimensions and location at facility. Provide a site plan if available.

UN-1219 Waste Isopropyl Alcohol is stored in 55 gallon drums in our  
hazardous waste storage area 25 feet x 30 feet. During 1985 1,000  
gallons was removed and incinerated by Tricil Limited, Ontario, Canada  
MIT 270019904.

NOTE: Hazardous wastes are those identified in 40 CFR 261. Hazardous constituents are those listed in Appendix VIII of 40 CFR Part 261.

3. For the units noted in Number 1 above and also those hazardous waste units in your Part A application, please describe for each unit any data available on any prior or current releases of hazardous wastes or constituents to the environment that may have occurred in the past or may still be occurring.

Please provide the following information

- a. Date of release
- b. Type of waste released
- c. Quantity or volume of waste released
- d. Describe nature of release (i.e., spill, overflow, ruptured pipe or tank, etc.)

None

American Tape Co. started April 30, 1983.

4. In regard to the prior or continuing releases described in Number 3 above, please provide (for each unit) any analytical data that may be available which would describe the nature and extent of environmental contamination that exists as a result of such releases. Please focus on concentrations of hazardous wastes or constituents present in contaminated soil or groundwater.

None

Attachment: Copy of inspections 1984 and 1985.

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the submittal is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations. (42 U.S.C. 6902 et seq. and 40 CFR 270.11(d))

Martin Decker Vice President Engineering

Typed Name and Title

*Martin Decker*  
Signature

January 21, 1986

Date

**CONTINUING RELEASES AT PERMITTED FACILITIES**

SEC. 206. Section 3004 of the Solid Waste Disposal Act is amended by adding the following new subsection after subsection (t) thereof:

"(u) CONTINUING RELEASES AT PERMITTED FACILITIES.—Standards promulgated under this section shall require, and a permit issued after the date of enactment of the Hazardous and Solid Waste Amendments of 1984 by the Administrator or a State shall require, corrective action for all releases of hazardous waste or constituents from any solid waste management unit at a treatment, storage, or disposal facility seeking a permit under this subtitle, regardless of the time at which waste was placed in such unit. Permits issued under section 3005 shall contain schedules of compliance for such corrective action (where such corrective action cannot be completed prior to issuance of the permit) and assurances of financial responsibility for completing such corrective action."